



935-965 MARKET STREET PROJECT CITYPLACE

DRAFT ENVIRONMENTAL IMPACT REPORT

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2005.1074E

STATE CLEARINGHOUSE NO. 2008102089

DRAFT EIR PUBLICATION DATE: NOVEMBER 4, 2009

DRAFT EIR PUBLIC HEARING DATE: DECEMBER 10, 2009

DRAFT EIR PUBLIC COMMENT PERIOD:
NOVEMBER 5, 2009 TO DECEMBER 21, 2009

Written comments should be sent to:

Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

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SAN FRANCISCO PLANNING DEPARTMENT

DATE: November 4, 2009
TO: Distribution List for the 935-965 Market Street Project (CityPlace)
FROM: Bill Wycko, Environmental Review Officer
SUBJECT: Request for the Final Environmental Impact Report for the
935-965 Market Street Project (2005.1074E)

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This is the Draft of the Environmental Impact Report (EIR) for the 935-965 Market Street Project (CityPlace). A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, we will prepare and publish a document titled "Summary of Comments and Responses" that will contain a summary of all relevant comments on this Draft EIR and our responses to those comments. It may also specify changes to this Draft EIR. Those who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Draft EIR together with the Summary of Comments and Responses document will be considered by the City Planning Commission in an advertised public meeting(s) and certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final EIR. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one, rather than two, documents. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like a copy of the Final EIR, therefore, please fill out and mail the postcard provided inside the back cover to the San Francisco Planning Department within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy. Public agencies on the distribution list will automatically receive a copy of the Final EIR.

Thank you for your interest in this project.



935-965 MARKET STREET PROJECT (CITYPLACE) DRAFT ENVIRONMENTAL IMPACT REPORT

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APPENDICES

Appendix A: Notice of Preparation and Initial Study

Appendix B: 2000 *Highway Capacity Manual* Level of Service Tables and Local and Regional Transit Screenlines

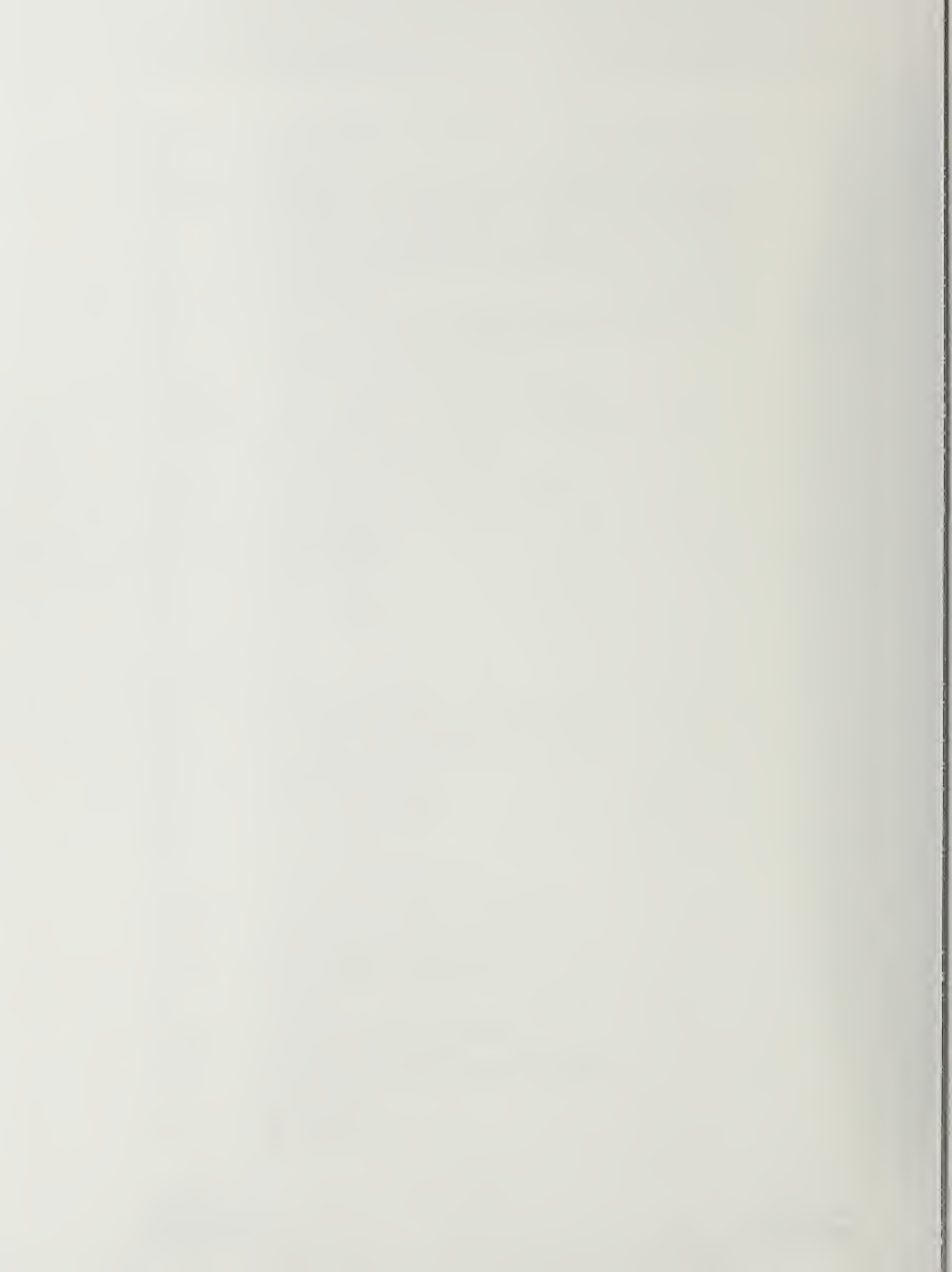
LIST OF ACRONYMS AND ABBREVIATIONS

AAQS	Ambient Air Quality Standard
ABAG	Association of Bay Area Governments
AC Transit	Alameda County Transit District
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit District
BCDC	(San Francisco) Bay Conservation and Development Commission
Caltrans	California Department of Transportation
CHIS	California Health Interview Survey
CAP	Clean Air Plan
CARB	California Air Resources Board
CCAR	California Climate Action Registry
CNRA	California Natural Resources Agency
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂ E	Carbon dioxide equivalent
CU	Conditional Use
dB	decibel
dBA	A-weighted decibel
DPW	Department of Public Works
EE application	Environmental Evaluation application
EIR	Environmental Impact Report
ERO	Environmental Review Officer
FAR	floor area ratio
FHWA	Federal Highway Administration
GGBHTD	Golden Gate Bridge Highway and Transportation District
gsf	gross square feet
HCM	Highway Capacity Manual
HRE	Historic Resources Evaluation
Hz	Hertz

List of Acronyms and Abbreviations

I-280	Interstate 280
I-80	Interstate 80
ISCOTT	Interdepartmental Staff Committee on Traffic and Transportation
L _{dn}	Day-Night Average Noise Level
L _{eq}	Equivalent Energy Noise Level
LOS	Level of Service
MTC	Metropolitan Transportation Commission
MTS	Metropolitan Transportation System
MUTCD	Manual on Uniform Traffic Control Devices
MMTCO ₂ E	Million metric tons of carbon dioxide equivalent
MUNI	San Francisco Municipal Railway
NAAQS	National Ambient Air Quality Standards
NHPA	National Historic Preservation Act
NO ₂	Nitrogen Dioxide
NOI	Notice of Intent
NO _x	nitrogen oxides
NOP	Notice of Preparation
O ₃	ozone
OAP	Ozone Attainment Plan
OPR	Governor's Office of Planning and Research
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
pphm	parts per hundred million
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAAQS	State Ambient Air Quality Standards
SamTrans	San Mateo County Transit District
sq. ft	square feet
SFBAAB	San Francisco Bay Area Air Basin
SFMTA	San Francisco Municipal Transportation Agency
SO ₂	sulfur dioxide
SoMa	South of Market

TACs	toxic air contaminants
TDR	transferable development rights
TEP	Transit Effectiveness Project
TIA	transportation impact analysis
TMP	Transportation Management Plan
U.S. 101	U.S. Highway 101
U.S. EPA	U.S. Environmental Protection Agency



SUMMARY

This Summary chapter for the 935-965 Market Street Project (CityPlace) Environmental Impact Report (EIR) begins with a brief description of the project. It then lists the impacts and mitigation measures described in this EIR and outlines the alternatives to the proposed project that were considered. The chapter concludes with an overview of the areas of controversy associated with the proposed project and issues to be resolved.

PROJECT SYNOPSIS

The project sponsor, 949 Market Street Associates LLC (a.k.a Urban Realty Co., Inc.), proposes to develop a new commercial building in downtown San Francisco. The building would be on the south side of Market Street, mid-block between Fifth and Sixth Streets.¹ Stevenson Street forms the southern boundary of the site. The approximately 1.06-acre project site is on Assessor's Block 3704, Lots 71, 72, and 73. It is in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Zoning Districts and the 120-X Height and Bulk District.

The project site is developed with three mixed-use commercial and office buildings: 935-939 Market Street, 941-945 Market Street, and 947-965 Market Street. These buildings, which are currently vacant, would be demolished to make way for the new building. They contain a total of about 186,400 gross square feet (gsf) including approximately 11,900 gsf of retail space, 67,000 gsf of office space, 95,700 gsf of vacant entertainment space, and 11,800 gsf of mechanical, storage, and service space. The 935-939 Market building is 94 feet tall and has five stories; the 941-945 Market building is 30 feet tall and has two stories; and the 947-965 Market building is 45 feet tall and has two stories.

The project site is located in the Mid-Market area of downtown San Francisco, which is generally between Fifth and Eleventh Streets along the Market and Mission Streets corridor. Union Square is about four blocks to the northeast (north of Geary Street); the cable car turnaround at Market and Powell Streets is about one block to the northeast; and the Hallidie Plaza BART/MUNI station entrance is one-half block to the northeast. Along Market Street the western boundary of the Yerba Buena Center Redevelopment Area is between Fourth and Fifth Streets, approximately one block east of the project site. The Tenderloin neighborhood starts about one-half block to the northwest, and the Civic Center area is three to four blocks to the northwest.

The proposed new building at 935-965 Market Street, named "CityPlace" by the project sponsor, would be five stories high and approximately 90 feet tall. It would have seven levels of retail space, including a mezzanine and subsurface level, and two subsurface levels of parking. A loading area and a vehicular driveway would be provided on the ground floor at the rear of the

¹ Market Street is oriented in a northeast-southwest direction, but for ease of understanding, it will be referred to as an east-west road in this report.

building; and a mechanical penthouse, including rooftop equipment, would be located above the fifth floor on the roof. Overall, the proposed project would involve construction of an approximately 375,700-gsf building, with about 264,010 gsf of retail uses; about 4,830 gsf of common areas; about 10,900 gsf of mechanical and storage space; and about 95,960 gsf of parking, loading, and driveways and maneuvering space. There would be 201 parking spaces, 21 bicycle parking spaces, and four loading spaces. The project would result in a net increase of about 189,300 gsf of developed space on the project site.

The project would include the use of transferable development rights (TDRs) subject to applicable height and bulk limitations. The project would require a Conditional Use authorization for parking in excess of permitted accessory parking and for demolition of a prior theater use;² variances for oversized floor heights and for the width of the loading and parking access on Stevenson Street, and review and consideration by the Planning Commission of an exception to freight loading requirements under Planning Code Section 309. In addition, the proposed project would require permit and plan review by BART due to the project site's proximity to the BART right-of-way under Market Street.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

The Initial Study for the proposed CityPlace project, published on October 1, 2008, determined that the project would have a less-than-significant effect or a less-than-significant effect with implementation of the mitigation measures included in the project related to the following environmental topics: Land Use; Aesthetics; Population and Housing; Cultural and Paleontological Resources; Transportation and Circulation (air traffic patterns only); Noise (groundborne vibration, construction noise, aircraft noise, interior noise levels); Air Quality (construction air quality, odors, greenhouse gas emissions); Wind and Shadow; Recreation; Utilities and Service Systems; Public Services; Biological Resources; Geology and Soils; Hydrology and Water Quality; Hazards/ and Hazardous Materials; Minerals/Energy Resources; and Agricultural Resources. (See Appendix A of this EIR for a copy of the Initial Study.)

Therefore, the EIR does not discuss these issues, with the exception of Land Use, Aesthetics, and Air Quality – greenhouse gas emissions. Land Use and Aesthetics are discussed for informational purposes. Transportation and circulation, traffic-related noise, and traffic-related and operational air quality and greenhouse gas emissions are analyzed in detail in this EIR.

Table S-1 summarizes the impacts of the proposed project found to be potentially significant and their corresponding mitigation measures. Table S-2 lists the improvement measures identified in Section IV.C, Transportation and Circulation, to help reduce traffic, transit, pedestrian, bicycle, parking, and loading impacts identified as less than significant in the Existing plus Project scenario.

² The building at 949 Market Street is most recently the site of the former St. Francis Theatre.

Table S-1: Summary of Significant Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Potentially Significant Impacts from the Initial Study			
Air Quality			
AQ-1a: Demolition, excavation, grading, foundation, and other ground-disturbing construction activity would affect localized air quality for up to about six months, causing a temporary increase in particulate dust and other pollutants that could affect sensitive receptors at the residences in the live/work lofts located between Stevenson and Jessie Streets, immediately southeast of the project site.	S	AQ-1a: Temporary Construction-Related Emissions – Exhaust Particulates The project sponsor shall require the construction contractor(s) to implement one or more additional measures to reduce construction exhaust emissions of PM ₁₀ . These measures include (but are not limited to) the use of late-model or retrofitted equipment; the use of PuriNO _x or other fuel additives; the use of ultra-low-sulfur fuel; and/or the use of PM ₁₀ particulate traps.	LS
Cultural and Paleontological Resources			
Cul-1: Excavation on the project site could cause a substantial adverse change in the significance of a buried or submerged archaeological resource and could disturb human remains, including those interred outside of formal cemeteries, located within the project site.	S	Cul-1: Subsurface Archaeological Resources Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged archaeological resources. The project sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall undertake an archaeological testing program as specified below. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (Archeo-Tec, <i>Archaeological Research Design and Treatment Plan for the 935-965 Market Street Project</i> , July 2007) at the direction of the Environmental Review Officer (ERO). In instances of inconsistency between the requirement of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirement of this archaeological mitigation measure shall prevail. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs	LS

Note:

S = Significant; LS = Less than Significant; SU = Significant and Unavoidable

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).	
		<p><i>Archaeological Testing Program.</i> The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA. At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If, based on the archaeological testing program, the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:</p> <p>A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or</p> <p>B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.</p>	
		<i>Archaeological Monitoring Program (AMP).</i> If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program shall be implemented, the archaeological monitoring program shall minimally include the following provisions:	

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils-disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context; The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource; The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with the project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits; The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile-driving/ construction activities and equipment until the deposit is evaluated. If, in the case of pile-driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile-driving activity may affect an archaeological resource, the pile-driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO. <p>Whether or not significant archaeological resources are encountered, the</p>	

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.	
		<p><i>Archaeological Data Recovery Program.</i> The archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.</p> <p>The scope of the ADRP shall include the following elements:</p> <ul style="list-style-type: none"> • <i>Field Methods and Procedures.</i> Descriptions of proposed field strategies, procedures, and operations. • <i>Cataloguing and Laboratory Analysis.</i> Description of selected cataloguing system and artifact analysis procedures. • <i>Discard and Deaccession Policy.</i> Description of and rationale for field and post-field discard and deaccession policies. • <i>Interpretive Program.</i> Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program. • <i>Security Measures.</i> Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities. • <i>Final Report.</i> Description of proposed report format and distribution of results. • <i>Curation.</i> Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. 	

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p><i>Human Remains and Associated or Unassociated Funerary Objects.</i> The treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines, Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.</p>	
		<p><i>Final Archaeological Resources Report.</i> The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.</p>	

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Hazards and Hazardous Materials</p> <p>Haz-1: The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	S	<p>Haz-1: Hazardous Materials/Contaminated Soil Step 1: Determination of Presence of Contaminated Soil The project site is located in an area of the city known to contain fill material from the 1906 Earthquake and Fire, and such fill may contain elevated concentrations of metal and petroleum hydrocarbons. Therefore, prior to approval of a building permit for the proposed project, the project sponsor shall hire a consultant to collect soil samples (borings) from areas on the site in which soil would be disturbed and test the soil samples for contamination (including substances such as total lead and petroleum hydrocarbons). The consultant shall analyze the soil borings as discrete, not composite samples. The consultant shall prepare a report that includes the results of the soil testing and a map that shows the locations from which the consultant collected the soil samples. The project sponsor shall submit the report on the soil testing for lead and petroleum hydrocarbons with the appropriate fee. These fees shall be charged pursuant to Section 31.47(c) of the <i>San Francisco Administrative Code</i>. DPH shall review the soil testing report to determine to whether soils on the project site are contaminated with lead or petroleum hydrocarbons at or above potentially hazardous levels. If DPH determines that the soils on the project site are not contaminated with lead or petroleum hydrocarbons at or above a potentially hazardous level, no further mitigation measures with regard to contaminated soils on the site would be necessary. Step 2: Preparation of Site Mitigation Plan If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead or petroleum hydrocarbons at or above potentially hazardous levels, the DPH shall determine if preparation of a Site Mitigation Plan (SMP) is warranted. If such a plan is requested by the DPH, the SMP shall include a discussion of the type and level of contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the DPH for review and approval. A copy of the SMP shall</p>	LS

Note:

S = Significant; LS = Less than Significant; SU = Significant and Unavoidable

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>be submitted to the Planning Department to become part of the case file.</p> <p>Step 3: Handling, Hauling, and Disposal of Contaminated Soils</p> <ol style="list-style-type: none"> Specific work practices: If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with petroleum hydrocarbons or lead at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including OSHA work practices) when such soils are encountered on the site. Dust suppression: Soils exposed during excavation for site preparation and construction activities shall be kept moist throughout the time they are exposed, both during and after work hours. Surface water runoff control: Where soils are stockpiled, Visqueen (a type of polyethylene film) shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather. Soils replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade. Hauling and disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California. <p>Step 4: Preparation of Closure/Certification Report</p> <p>After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to DPH for review and approval. The closure/certification report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.</p>	

Note:

S = Significant; LS = Less than Significant; SU = Significant and Unavoidable

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Potentially Significant Impacts Identified in the DEIR			
Transportation and Circulation			
TR-1: Increased traffic volumes due to the proposed project could result in deterioration in the Level-of-Service at the Fifth Street/Stevenson Street intersection.	S	M-TR-1a: Install a mid-block traffic signal at the Fifth Street/Stevenson Street intersection; or M-TR-1b: Prohibit left turn movements from Stevenson Street to Fifth Street; or M-TR-1c: Remove eight on-street parking spaces and two yellow loading zones on Stevenson Street west of the project site and reconfigure Stevenson Street to two-way traffic between the project site and Sixth Street, and M-TR-2: See below for detailed description. However, M-TR-1a, 1b and 1c have been determined by SFMTA to be infeasible.	SU
TR-2: Large trucks accessing Stevenson Street to serve the proposed project and adjacent land uses would adversely impact operations on Stevenson Street and at the intersections of Sixth Street/Stevenson Street and Fifth Street/Stevenson Street.	S	M-TR-2: Establish a loading dock scheduling program for each retail tenant to limit loading of trucks greater than 30 feet to the hours between 10:00 PM and 6:00 AM every day; prohibit all truck loading to the proposed project between 3:00 PM and 6:00 PM due to the P.M. peak period tow-away lane on northbound Sixth Street; prohibit retail tenants from using trucks longer than 45 feet; station a loading dock manager on site to help direct trucks of all sizes into and out of the loading dock, to control traffic on Stevenson Street at all times the loading dock is available for loading activity, and to implement and enforce the dock scheduling program; and work with the owners of other land uses on Stevenson Street to incorporate their loading activities in the loading dock when the proposed project's retail uses do not need the loading dock spaces, with the intent of providing safe off-street loading spaces to nearby land uses and minimizing double parking of trucks on Stevenson Street.	LS
TR-3: The proposed project's contribution to critical vehicle movements at the Fifth Street/Stevenson Street intersection would result in a cumulatively considerable contribution to the significant adverse cumulative traffic impact.	S	M-TR-3: Install a mid-block traffic signal at the Fifth Street/Stevenson Street intersection. However, M-TR-3 has been determined by the SFMTA to be infeasible.	SU
TR-4: The proposed project's contribution to critical vehicle movements at the Fifth Street/Mission Street intersection would result in a cumulatively considerable contribution to the significant adverse cumulative traffic impact.	S	M-TR-4: Extend the restriction on northbound and southbound left turns at the Fifth Street/Mission Street intersection to taxi and bus movements to improve intersection operating conditions from LOS E (77.2 seconds of delay per vehicle) to LOS D (50.4 seconds of delay per vehicle). However, the feasibility of this mitigation is uncertain.	SU

Note:

S = Significant; LS = Less than Significant; SU = Significant and Unavoidable

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CityPlace
Draft EIR

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Potentially Significant Impacts Identified in the DEIR if the Proposed <i>BAAQMD CEQA Guidelines Update</i> Is Adopted			
Air Quality			
AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	S	M-AQ-2: Construction-Related Emissions To reduce the impact to a less-than-significant level, architectural coatings with an average VOC content of no more than 187 grams VOC per liter could be used.	LS
AQ-3: Construction of the proposed project would result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.	S	No feasible mitigation measures have been identified at this time.	SU

Note:
S = Significant; LS = Less than Significant; SU = Significant and Unavoidable

Table S.2: Summary of Improvement Measures

Improvement Measures	Topic
Improvement Measure I-TR-A: The project sponsor would request that the City (SFMTA and/or DPW) establish a right turn pocket on the westbound approach of the Sixth Street / Mission Street intersection. Creating a right turn pocket would require the removal of several on-street parking/loading spaces on the westbound approach of Mission Street to restripe the parking lane as a full-time right turn pocket. To maintain on-street loading facilities in the area, this would require the reconfiguration of adjacent regular metered parking spaces to yellow metered spaces to replace the existing loading spaces that would be removed to accommodate the turn pocket. The striping could be similar to what is currently installed at the westbound approach of Mission Street at Fifth Street. It should be noted that the creation of a right turn pocket would be considered by SFMTA once the proposed project is occupied.	Transit / Traffic
Improvement Measure I-TR-B: Establish a transit pass program that would offer tax incentives or benefits to retail employees who use transit to and from the proposed project, or otherwise implement the requirements of Environment Code Chapter 421.	Transit
Improvement Measure I-TR-C: Install a sign that reads "Parking Lot Full" on the building located at 995 Market Street on the Stevenson Street side of the building that can be activated from inside the garage by parking garage operators. This sign would be used to warn patrons that the garage is full and redirect them to an additional parking facility near the proposed project site. This sign would be affixed to the side of the building so that it is visible to northbound vehicles on Sixth Street so drivers could read it and continue to other facilities without turning onto Stevenson Street. The project sponsor would make commercially reasonable efforts to work with nearby property owners to install a fixed sign. However, if this were not achievable, the project sponsor would install a permanent sign near the parking garage entrance that can be activated from inside the garage by parking garage operators. This sign would be used to warn patrons that the garage is full and redirect them to an additional parking facility near the proposed project site. This sign would be affixed to the side of the building so that it is visible to eastbound vehicles on Stevenson Street.	Parking
Improvement Measure I-TR-D: Educate the retail tenants about the limitations of Stevenson Street and the mitigation measure to restrict access to Stevenson Street for trucks between 30 and 45 feet to night hours (between 10:00 PM and 6:00 AM).	Loading
Improvement Measure I-TR-E: Make commercially reasonable efforts to work with adjacent tenants and property owners to establish an area-wide freight management system.	Loading
Improvement Measure I-TR-F: Make the proposed project's loading dock available at pre-specified times for adjacent land uses that would not coincide with the scheduled loading activities for the proposed project, e.g., between 10:00 PM and 6:00 AM.	Loading
Improvement Measure I-TR-G: Install a pedestrian warning system near the project driveway and loading docks to caution pedestrians on Stevenson Street when a driver approaches the exit. This device should be selected and positioned in such a way as to minimize any noise impacts to nearby residents.	Pedestrian
Improvement Measure I-TR-H: Install mirrors on both sides of the driveway opening and loading dock opening to provide a line-of-sight for pedestrians and drivers.	Pedestrian
Improvement Measure I-TR-I: Pursuant to the <i>San Francisco Better Streets Plan</i> , install signage on Stevenson Street alerting drivers to the unique pedestrian nature of the street.	Pedestrian

Table S.2 (continued)

Improvement Measures	Topic
Improvement Measure I-TR-J: Maintain the bicycle storage facilities on the top level of the garage or relocate to street level, and provide convenient and direct access to these facilities.	Bicycle
Improvement Measure I-TR-K: Install parking space counters on each public parking level to direct drivers to available parking spaces.	Parking
Improvement Measure I-TR-L: In conjunction with the proposed "Parking Lot Full" sign, provide real-time notification before entering the garage on the number of available spaces.	Parking
Improvement Measure I-TR-M: Provide direction to other nearby facilities via signs, a website, or map handouts, should substantial queues occur on a consistent basis.	Parking
Improvement Measure I-TR-N: Provide valet parking for customers during seasonal demand peaks, at the discretion of the parking garage owner.	Parking
Improvement Measure I-TR-O: Prohibit the retail tenants from using trucks larger than 45 feet to deliver goods to the proposed project. If they cannot use smaller trucks, the retail tenants would be advised that they cannot safely enter Stevenson Street and should plan to use the Market Street loading bays. Retailers would also be advised that in the event these bays are taken, deliveries to the site cannot be made safely or legally, as double-parking on any of the streets surrounding the site is prohibited.	Loading
Improvement Measure I-TR-P: Should a truck larger than 45 feet access Stevenson Street at any time, the project's loading dock supervisor should direct these trucks to either attempt to load from the Market Street zones (if available) or to off-load merchandise and goods at another location, transfer them to smaller trucks, and return to use the loading dock. If using smaller trucks is not a viable option, the retail tenants would be encouraged to use the loading zones on Market Street to reduce the potential for double-parking along Stevenson Street.	Loading
Improvement Measure I-TR-Q: Should a truck between 30 and 45 feet access Stevenson Street between the hours of 6:00 AM and 10:00 PM, the project's loading dock supervisor should direct these trucks to either attempt to load from the Market Street zones (if available), or to off-load merchandise and goods at another location, transfer the merchandise to smaller trucks and return to use the loading dock. If using smaller trucks is not a viable option, the retail tenants would be encouraged to use the loading zones on Market Street to reduce the potential for double-parking along Stevenson Street.	Loading
Improvement Measure I-TR-R: Provide loading dock personnel to assist in directing large trucks (30 feet or greater) onto Stevenson Street from Sixth Street, into and out of the loading dock, and safely onto Fifth Street, when deemed necessary by the project's loading dock manager.	Loading / Traffic
Improvement Measure I-TR-S: Coordinate construction activities with the projects planned at 1066 Market Street, 1036 Mission Street, 942 Mission Street, and 575 Jessie Street (and any others near the project site) to identify any potential conflicts between truck routes or construction traffic control, to reduce traffic congestion and transit disruption.	Traffic
Improvement Measure I-TR-T: Submit project plans for BART permit and plan review.	Construction

SUMMARY OF PROJECT ALTERNATIVES

Three alternatives are evaluated in this EIR: A: No Project Alternative; B: Reduced Intensity Alternative; and C: No Garage Alternative. A comparison of the potential environmental impacts that may result from the alternatives with those of the proposed project is provided in Table S.3.

A. No Project Alternative

CEQA requires an EIR to evaluate a No Project Alternative in order to compare the effects of the proposed project with the effects of taking no action. Under the No Project Alternative, the three mixed-use commercial and office buildings would not be demolished and the parcels would not be consolidated. This alternative would not preclude future proposals for redevelopment of the different parcels for uses permitted in the C-3-G and C-3-R (Downtown General Commercial and Downtown Retail) Districts, and building proposals in conformance with the 120-X Height and Bulk District. Assuming that the existing physical conditions in the project area were to continue for the foreseeable future, conditions described in detail for each environmental topic in the Initial Study and in Chapter IV, Environmental Setting and Impacts, would remain and none of the impacts associated with the proposed project would occur.

B. Reduced Intensity Alternative

The Reduced Intensity Alternative would include approximately half of the gross floor area of the proposed project, i.e., about 124,350 gsf of retail uses; about 39,925 gsf of parking (not including loading, and driveways and maneuvering spaces); and about 7,810 gsf of building services (common areas, mechanical, and storage spaces). Under this development alternative, the proposed building would be about 56 feet tall, excluding the mechanical penthouse, with three above-ground floors of retail space and one subsurface level for retail parking with 80 parking spaces and the same number of bicycle parking spaces. The proposed building would retain the same number of loading docks. This alternative would result in less excavation because the two-level underground parking garage would not be retained. A partial basement at the existing depth of the 10-foot basement would remain and access to this area would be provided for merchandise pick-up.

The project approvals needed for this alternative would be similar to those needed for the proposed project with the exception that the project sponsor would not be required to purchase transferable development rights because the proposed building would not exceed the base floor area ratio of 6:1, and would not require an exception to the requirements for freight loading spaces.

Table S.3: Comparison of Impacts of the Proposed Project to Alternatives B and C

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C: No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking 201 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking
Impacts			
Land Use	No significant effects	No significant effects	No significant effects
Aesthetics	No significant effects	No significant effects	No significant effects
Transportation and Circulation	TR-1: Deterioration in the Level of Service at the Fifth Street/Stevenson Street intersection from LOS D to LOS E. Mitigation is considered infeasible.	No significant effect at the Fifth Street / Stevenson Street intersection.	No significant effect at the Fifth Street / Stevenson Street intersection.
	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street /Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.
	TR-3: Considerable contribution to a significant cumulative traffic impact at the Fifth Street/Stevenson Street intersection. Mitigation is considered infeasible.	No contribution to significant cumulative impact at the Fifth Street/Stevenson Street intersection.	No contribution to significant cumulative impact at the Fifth Street / Stevenson Street intersection.
	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street/Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street /Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	No considerable contribution to significant cumulative traffic impact at the Fifth Street / Mission Street intersection.
	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	Considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection. No feasible mitigation identified.
Noise	No significant effects	No significant effects	No significant effects

Table S.3 (continued)

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C: No Garage Alternative
Impacts			
Air Quality ^a	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROG _s , from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROG _s , from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROG _s , from 80 pounds per day to 54 pounds per day.
	AQ-3: Construction of the proposed project would result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.

Note:

^a The significant Air Quality impacts identified here would occur if the significance thresholds in the current *BAAQMD CEQA Guidelines Update* are adopted. Under the significance thresholds currently utilized by the City of San Francisco, neither the proposed project nor the alternative would result in a significant air quality impact.

Similar to the proposed project, development of the Reduced Intensity Alternative would not result in significant land use or aesthetic impacts. This alternative would result in fewer transportation-related impacts compared to the proposed project primarily because of the reduction in trip generation. The project-specific transportation impact at the Fifth Street/Stevenson Street intersection and the cumulative transportation impact at the Fifth Street/Stevenson Street intersection would not occur. However, this alternative would continue to contribute to the cumulative transportation impact at the Fifth Street/Mission Street intersection. Additionally, as a result of the reduced number of vehicle trips, the traffic-related noise impacts and traffic-related and operational-related impacts on regional air quality would be less than those with the proposed project, which were determined to be less than significant.

C: No Garage Alternative

The No Garage Alternative would not include any on-site parking. In all other respects, e.g., amount of retail space, the number of loading spaces and bicycle parking spaces, and building height and massing, the proposed project would be the same. The project approvals needed for this alternative would be similar to those needed for the proposed project with two exceptions: a conditional use authorization for retail parking in excess of the amount allowed as accessory would not be needed and, because of the removal of the non-accessory parking gsf, the purchase of TDRs would not be required.

Similar to the proposed project, development of the No Garage Alternative would not result in significant land use or aesthetic impacts. This alternative would result in fewer transportation impacts compared to the proposed project with parking. However, the alternative would result in a cumulatively considerable contribution to the adverse cumulative conditions at the Fourth Street/Howard Street intersection, which would not occur from development of the proposed project. The loading operations associated with this alternative would be similar to those of the proposed project and would cause similar impacts along Stevenson and at the Fifth Street/Stevenson Street and Sixth Street/Stevenson Street intersections. Additionally, traffic-related noise impacts on sensitive receptors on the south side of Stevenson Street would be reduced, while traffic-related operational impacts on regional air quality would be similar to those with the proposed project, all of which were determined to be less than significant.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated.

The selection of the environmentally superior alternative is based upon the evaluation of impacts in Chapter VI, Alternatives, and summarized in this section. There would be a greater amount of excavation and soils disturbance with the Reduced Intensity Alternative than with the No Garage Alternative which may lengthen the disruption in the project vicinity with the Reduced Intensity Alternative.

Both the Reduced Intensity Alternative and the No Garage Alternative would result in fewer transportation-related impacts than the proposed project. However, the effects of transportation-related impacts for the No Garage Alternative with respect to pedestrians, transit and traffic would be less than with the Reduced Intensity Alternative. The Reduced Intensity Alternative would generate greater vehicular traffic on Stevenson Street than the No Garage Alternative, which would increase the potential for conflicts between pedestrians and vehicles. Both alternatives would result in a significant cumulative traffic impact at one intersection. The Reduced Intensity Alternative would result in a significant cumulative impact at the intersection of Fifth and Mission Streets. The No Garage Alternative would result in a significant cumulative impact at the intersection of Fourth and Howard Streets. However, the magnitude of the deterioration in intersection operations would be greater at the intersection of Fifth Street and Mission Street than at the intersection of Fourth Street and Howard Street. In addition, there is greater transit volume moving through the intersection of Fifth Street and Mission Street as well as increased pedestrian activity so the potential for conflicts with transit and pedestrians may also be increased with the Reduced Intensity Alternative when compared to the No Garage Alternative. In light of these considerations, the No Garage Alternative would be considered the environmentally superior alternative to the proposed project.

AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

There are no known areas of controversy or issues yet to be resolved based on public agency comments received on the Notice of Preparation of an Environmental Impact Report and Initial Study, published October 1, 2008. However, comments from interested parties express concern about potential parking impacts in the project vicinity, loading activities on Stevenson Street, truck traffic on Fifth Street, effects of traffic congestion on Sixth Street, effects on transit, open space design, and the type of alternative analyzed. These issues are addressed in Section IV.C, Transportation and Circulation, and Chapter VI, Alternatives.

I. INTRODUCTION

PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

This Environmental Impact Report (EIR) has been prepared by the City of San Francisco Planning Department, the Lead Agency for the proposed project, in conformance with the provisions of the California Environmental Quality Act (CEQA) and the *CEQA Guidelines* (California Public Resources Code Sections 21000 et seq., and California Code of Regulations Title 14, Sections 1500 et seq., “*CEQA Guidelines*”), both as amended. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project. This focused EIR assesses potentially significant impacts in the areas of transportation, air quality, and noise. As defined in *CEQA Guidelines* §15382, a “significant effect on the environment” is:

... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

As stated in the CEQA Guidelines, an EIR is an “informational document” intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. CEQA provides that public agencies should not approve projects until all feasible means available have been employed to substantially lessen the significant environmental effects of such projects.¹ City decision-makers will use the certified EIR, along with other information and public processes, to determine whether to approve, modify, or disapprove the proposed project, and to specify any applicable environmental conditions as part of project approvals.

PROJECT SUMMARY

The approximately 1.06-acre project site is on Assessor’s Block 3704, Lots 71, 72, and 73. It is located on the south side of Market Street between Fifth and Sixth Streets. The proposed project would demolish the three two- to five-story buildings on the site and redevelop the site with one five-story, 90-foot-tall retail building, with associated building services and subsurface parking. Overall, the building would contain approximately 375,700 gross square feet (gsf), with about 264,010 gsf of retail uses; about 4,830 gsf of common areas; about 10,900 gsf of mechanical and storage space; and about 95,960 gsf of parking, loading, and driveways and maneuvering space.

¹ “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, environmental, social, and technological factors (Public Resources Code Section 21061.1).

The project would result in a net increase of about 189,300 gsf of developed space on the project site. The project site is in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Zoning Districts, and the 120-X Height and Bulk District. The project would include the use of transferable development rights (TDRs) subject to applicable height and bulk limitations. The project would require Conditional Use authorizations for parking in excess of permitted accessory parking and for demolition of a former theater use at the 949 Market Street building; variances for oversized floor heights and for the width of the loading and parking access on Stevenson Street; review and consideration by the Planning Commission of an exception to freight loading requirements under Planning Code Section 309; approval from the Department of Public Works for merger of the three existing lots into one lot, and permit and plan review by BART due to the project site's proximity to the BART's right-of-way.

ENVIRONMENTAL REVIEW PROCESS

An Environmental Evaluation application (EE application) was submitted to the Planning Department on November 14, 2005. A Revised EE application was subsequently submitted on January 29, 2007. The filing of the Revised EE application initiated the environmental review process outlined below.

Notice of Preparation and Initial Study

The Planning Department distributed a Notice of Preparation (NOP) and an Initial Study on October 1, 2008, announcing its intent to prepare and distribute an EIR. Since publication of the NOP and the Initial Study, comment letters were submitted to the Planning Department by public agencies and other interested parties. The NOP/Initial Study is included in this Draft EIR as Appendix A.

The following public agencies submitted comment letters:

- The State Clearinghouse acknowledged receipt of the NOP/Initial Study.
- The State Department of Transportation (Caltrans) provided summary comments pertaining to traffic volume and congestion on the State Highway System and recommended that a traffic impact analysis be prepared.

The following interested parties submitted comment letters:

- The Alliance for a Better District 6 neighborhood group expressed concerns about parking, open space design, truck traffic on Fifth Street, and the effects of traffic congestion on Sixth Street.
- The Sierra Club expressed concerns about parking impacts and a preference for analyzing a mixed-use development with housing over retail as a project alternative.

- The Pearl Art & Craft Supplies letter expressed support for the project but had concerns about loading activities, particularly on Stevenson Street, and proposed loading mitigation and improvement measures.

The Initial Study determined that the proposed project would have a less-than-significant effect or a less-than-significant effect with implementation of mitigation measures on the following environmental factors:

- Land Use
- Aesthetics
- Population and Housing
- Cultural/Paleontological Resources
- Wind and Shadow
- Recreation
- Utilities and Service Systems
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Mineral and Energy Resources
- Agricultural Resources

The Initial Study also determined that the proposed project may have a potentially significant effect on the following environmental factors:

- Transportation and Circulation
- Noise (traffic-generated)
- Air Quality (traffic-generated and operational)

In light of the potential for the proposed project to result in significant effects on the environment, the Initial Study concluded that an EIR would be required.

Draft EIR

This Draft EIR is prepared in accordance with CEQA and the *CEQA Guidelines*. It provides an analysis of the physical environmental impacts of construction and operation of the proposed project. The *CEQA Guidelines* define the environmental effects of a project as changes from the environmental setting (existing conditions) that are attributable to the project.

Copies of the Draft EIR are available at the San Francisco Planning Department, 1660 Mission Street, 1st Floor Planning Information Counter, San Francisco, CA 94103. Additionally, the Draft EIR is available to view or download at the Planning Department web site at <http://www.sfplanning.org/mea> by choosing the link for General CEQA Cases and looking for Case File Number 2005.1074E. All documents referenced in this Draft EIR are available for

review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Case File Number 2005.1074E. The distribution list for the Draft EIR is also available for review at the Planning Department.

Following publication of this Draft EIR, there will be a public hearing before the Planning Commission during a 45-day public review and comment period to solicit public comment on the adequacy and accuracy of information presented in this Draft EIR. The public comment period for this EIR is **November 5, 2009 to December 21, 2009**. The public hearing on this Draft EIR has been scheduled at the City Planning Commission for **December 10, 2009** in Room 400 City Hall, Dr. Carlton B. Goodlett Place (call 588-6422 the week of the hearing for a recorded message giving a more specific time).

In addition, readers are invited to submit written comments on the adequacy of the document, that is, whether this Draft EIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures. Comments are most helpful when they suggest specific alternatives and/or additional measures that would better mitigate significant environmental effects. *CEQA Guidelines* Section 15096(d) calls for responsible agencies to provide comments on project activities within the agencies' areas of expertise and to support comments with either oral or written documentation.²

Written comments should be submitted to:

Bill Wycko, Environmental Review Officer
Re: 935-965 Market Street Project (CityPlace) Draft EIR
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Comments must be received by 5:00 PM on **December 21, 2009**.

Final EIR

Following the close of the public review and comment period, the Planning Department will prepare and publish a document titled "Comments and Responses," which will contain a summary of all relevant comments on this Draft EIR and the City's responses to those comments, along with copies of the letters received and a transcript of the Planning Commission public hearing on the Draft EIR. This Draft EIR, together with the Comments and Responses document, will be considered by the Planning Commission in an advertised public meeting, and then certified as a Final EIR if deemed adequate.

² CEQA Section 21069 defines a responsible agency as a "public agency, other than the lead agency which has responsibility for carrying out or approving a project."

II. PROJECT DESCRIPTION

A. INTRODUCTION

The project sponsor, Urban Realty Co., Inc., proposes to develop a new building in downtown San Francisco, on the south side of Market Street between Fifth and Sixth Streets.¹ There are three parcels on the site that are developed with three mixed-use commercial and office buildings: 935-939 Market Street, 941-945 Market Street, and 947-965 Market Street, which are currently vacant. The three existing buildings would be demolished to make way for the new building. The proposed new building at 935-965 Market Street (named “CityPlace” by the project sponsor) would be five stories high and would contain new retail uses, associated building services, and a below-grade parking garage.

B. OBJECTIVES OF THE PROJECT SPONSOR

The project sponsor for the proposed CityPlace project is 949 Market Street Associates LLC (a.k.a Urban Realty Co., Inc.), and the project architect is Gensler. The overall purpose of the project is to create a building with new and expanded retail uses, in keeping with the surrounding retail uses in the project area. Specifically, the objectives of the project sponsor are as follows:

- Produce a significant amount of new retail space characterized by large floor plates in order to accommodate “value-based retailers” and to provide additional downtown retail shopping opportunities for value-based merchandise not typically available in the urban core.
- Support local job creation by constructing a large new retail building that would increase short-term construction jobs and long-term employment opportunities in the area.
- Create a significant increase in pedestrian activity in the Mid-Market area during both daytime and evening hours by constructing a large retail project that will attract patrons from the downtown office district during both daytime and evening hours, from other neighborhoods of the City, and from outlying cities who wish to shop in the City during weekdays and weekends.
- Construct a high-quality, cost-effective development project that produces a reasonable return on investment for the project sponsor and its investors and is able to attract construction financing.
- Construct a high-quality building with contemporary architectural design that reinforces the 90-foot streetwall height of the most significant buildings on the 800 and 900 blocks of Market Street, including 901 Market Street (the Hale Brothers Department Store building) and contrasts architecturally with the neo-classical style of these buildings.

¹ Market Street is oriented in a northeast-southwest direction, but for ease of understanding, it will be referred to as an east-west road in this report.

- Provide sufficient off-street parking to allow customers to transport the bulky items sold at value-based retailers (such as home furnishings, household supplies, home electronics, appliances and sporting goods, as well as large quantities of clothing for back to school or holiday shopping trips).
- Produce a significant amount of net new retail space in order to generate net new sales tax revenues for the City's General Fund and to support City services that are funded by sales tax revenue.

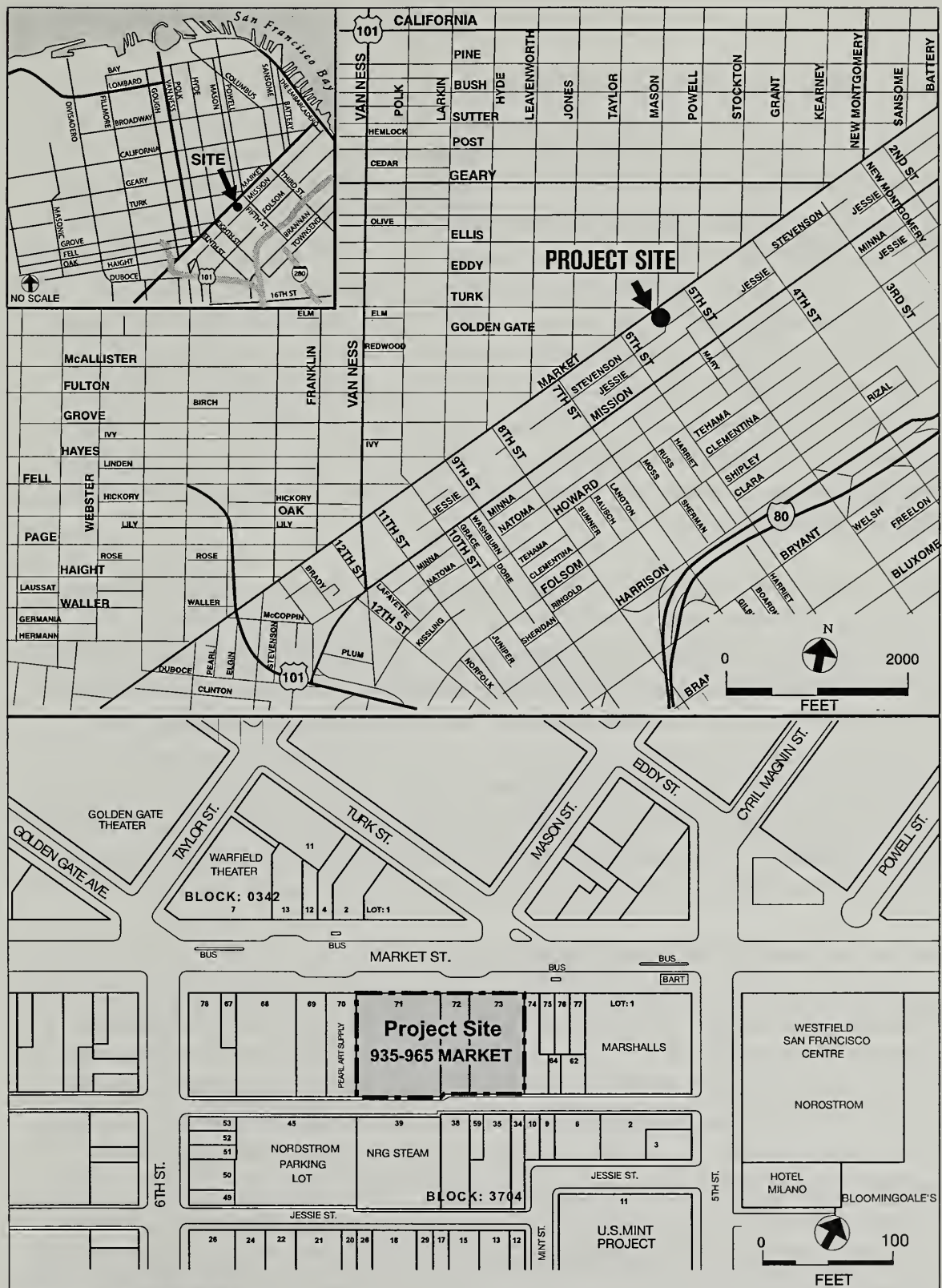
C. PROJECT LOCATION

The project block is bounded by Fifth Street on the east and Sixth Street on the west. The rectangular project site is in the middle of the block, opposite the intersection of Market Street with Turk and Mason Streets. Stevenson Street forms the southern boundary of the site (see Figure II.1: Project Location). The project site includes three addresses: 935-939 Market Street, 941-945 Market Street, and 947-965 Market Street (collectively referred to as 935-965 Market Street in this EIR). The 1.06-acre project site encompasses Lots 71, 72, and 73 on Assessor's Block 3704.

The project site is located in the Mid-Market area of downtown San Francisco, generally between Fifth and Eleventh Streets along the Market and Mission Streets corridor. Union Square is about four blocks to the northeast (north of Geary Street); the cable car turnaround at Market and Powell Streets is about one block to the northeast; and the Hallidie Plaza underground transit station entrance is one-half block to the northeast. Along Market Street the western boundary of the Yerba Buena Center Redevelopment Area is between Fourth and Fifth Streets, approximately one block east of the project site. The Tenderloin neighborhood starts about one-half block to the northwest, and the Civic Center area is three to four blocks to the northwest.

Vehicles can access the site vicinity via Market Street, Sixth Street, or Fifth Street (all two-way streets), or alternately Stevenson Street (a one-way alley with traffic flow west to east). The project site is served by San Francisco Municipal Railway (MUNI) bus and streetcar lines along Market Street, MUNI bus lines along Fifth Street and Mission Street, and MUNI Metro and Bay Area Rapid Transit (BART), through the Powell Street Station at Fifth and Market Streets.

The project site is in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Zoning Districts, and the 120-X Height and Bulk District. Both the C-3-G and C-3-R districts permit a base floor area ratio (FAR) of 6:1. A maximum FAR of 9:1 is allowable with the use of transferable development rights (TDRs) and subject to applicable height and bulk limitations.



SOURCE: Turnstone Consulting, Gensler

CITYPLACE

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FIGURE II.1: PROJECT LOCATION

D. PROJECT SITE CONDITIONS

Currently, the project site is occupied by three mixed-use commercial and office buildings: 935-939 Market Street, 941-945 Market Street, and 947-965 Market Street, which are vacant. (Views of the existing buildings are provided in Section IV.B, Aesthetics.) These existing buildings contain approximately 186,400 gross square feet (gsf), including approximately 11,900 gsf of retail uses, 67,000 gsf of office uses, 95,700 gsf of vacant entertainment space, and 11,800 gsf of mechanical, storage, and service space. The 935-939 Market building is 94 feet tall and has five stories; the 941-945 Market building is 30 feet tall and has two stories; and the 947-965 Market building is 45 feet tall and has two stories. The existing lot coverage is 100 percent, and the existing FAR is approximately 4:1. There is no open space on the project site, nor are there any off-street parking spaces or loading spaces. Pedestrians can access the existing buildings from Market Street. No trees exist on the project site; however, there are adjacent street trees along Market Street.

Recent tenants of 935-939 Market Street have included retail, government, institutional, and office uses. All of these tenants have vacated the building. The Asian Law Caucus recently relocated to its new facilities at 55 Columbus Avenue. The project sponsor has acquired an office building at 980-984 Mission Street and has retrofitted the building for University of California, San Francisco Citywide Case Management and Community Focus, which relocated there. The Social Security Administration moved into the new Federal Building at the intersection of Seventh and Mission Streets. With the exception of Social Security Administration, the project sponsor has assisted all of the tenants through rent subsidies, architectural services, and/or other forms of assistance. No tenants remain at 941-945 Market Street. 947-949 Market has been vacant since 2000 and was most recently the site of the former St. Francis Theatre.

E. PROJECT CHARACTERISTICS

The project sponsor proposes to demolish the three existing two- to five-story buildings and redevelop the site with one five-story, approximately 90-foot-tall commercial building, with new retail uses, associated building services, and a below-grade parking garage with 201 off-street parking spaces. The proposed building would include seven levels of retail space, including a mezzanine and subsurface level (floor B1) and two subsurface levels (floors B2 and B3) of parking. Building services would occupy a small portion of all above- and below-ground floors; a loading area and a vehicular driveway would be provided on the ground floor; and a mechanical penthouse, including rooftop equipment, would be located on the roof above the fifth floor. The proposed project would involve the construction of an approximately 375,700-gsf building, with approximately 264,010 gsf of retail uses; about 4,830 gsf of common areas such as the ground-floor lobby; about 10,900 gsf of mechanical and storage space; and about 95,960 gsf of parking,

loading, and circulation.² The project would result in a net increase of about 189,300 gsf of developed space on the project site. Table II.1 summarizes the characteristics of the proposed project.

Table II.1: Summary of Project Characteristics

Characteristic	Proposed Project
Proposed space (gsf)	
Retail	264,010
Common areas	4,830
Mechanical/Storage	10,900
Parking/Loading/Circulation	<u>95,960</u>
Total	375,700
Number of buildings	1
Height / Number of stories	90 feet / 5 stories plus mezzanine ^a
Parking levels	3 subsurface levels ^b
Number of parking spaces	201 ^c
Number of loading spaces	3 ^d

Notes:

^a Does not include 16-foot-tall mechanical penthouse.

^b Retail uses at first below-grade level; parking and mechanical/storage at second and third below-grade levels.

^c Independently accessible spaces. With valet parking, the garage would accommodate up to 280 vehicles.

^d A fourth loading dock would be for garbage handling.

Source: Gensler Architects and Turnstone Consulting

The total gross floor area of the proposed project attributable to FAR is approximately 371,239 gsf,³ or 8.1 FAR, which is more than the base FAR floor area of 276,378 gsf and less than the allowable 9:1 gross floor area of 414,567 gsf.⁴ Therefore, the project would include TDRs. The amount of TDR space necessary for the proposed project could range from approximately

² The project includes approximately 79,850 gsf of parking area. Approximately 21,710 gsf of the parking area would be accessory parking; the remaining gsf (approximately 58,140 gsf) would be non-accessory parking. According to *Planning Code* §204.5, off-street parking is accessory if it is (1) located on the same lot as the development it serves; and (2) used by the occupants of the development to which it is accessory. Accessory parking facilities may not exceed the following parking amounts: (1) 150 percent of the required number of spaces where three or more spaces are required; and (2) 15 spaces or seven percent of the total gross floor area of the development, whichever is greater. Off-street parking which exceeds the code-specified accessory parking amounts is considered to be non-accessory parking. Projects require Conditional Use authorization (CU) for provision of non-accessory parking.

³ *Planning Code* §102.11 requires that approximately 46,063 gsf be added to the building square footage for purposes of the FAR calculation, to reflect an average floor height in excess of 15 feet. Approximately 59,567 gsf is excluded from the FAR calculation, under *Planning Code* §102.9(b). This excluded space includes the following: accessory parking spaces and aisles; accessory loading spaces; driveway and maneuvering areas; storage; building and pedestrian circulation on the first floor; mechanical areas segregated from occupied floors; roof-level mechanical equipment; the atrium; and the unexcavated area on floor B3. The floor area devoted to non-accessory parking is included in the FAR calculations, as required.

⁴ The base allowable floor area for the project equals the lot area (46,063 square feet [sq. ft.]) times 6, which is 276,378 gsf. The maximum allowable gross floor area for the project equals the lot area (46,063 sq. ft.) times 9, which is 414,567 gsf.

48,798 gsf to approximately 94,861 gsf, depending on whether a variance from the requirements of *Planning Code* Section 102.11 is granted.⁵

Proposed Project Design

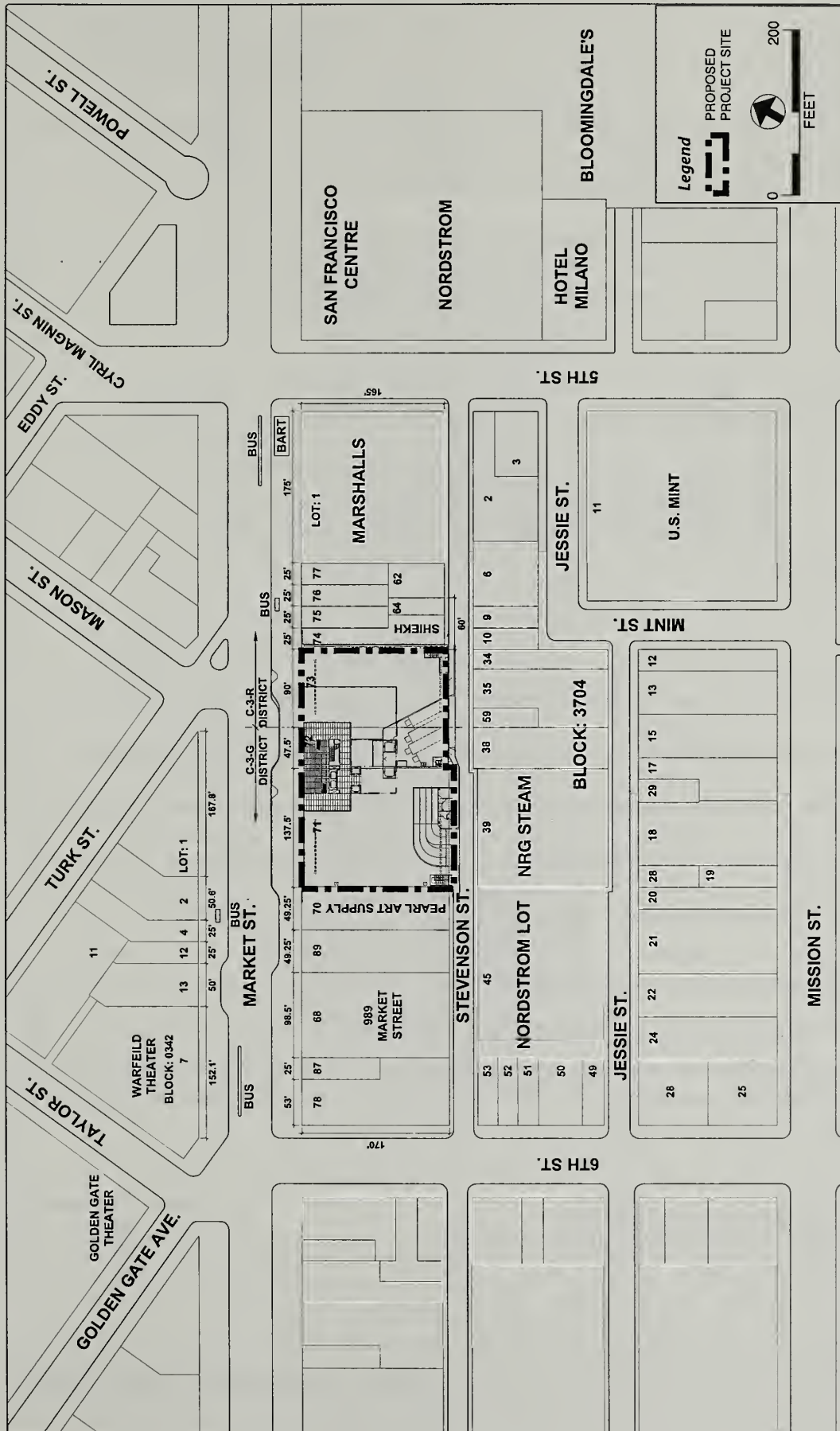
The proposed building is intended to be designed and constructed to meet LEED® Gold certification. As part of the process of certification, the proposed building would meet or exceed energy efficiency standards set by Title 24 and the City's Green Building Ordinance. The proposed building would rise five stories, plus a mezzanine, to a total height of about 90 feet above street level, with no setbacks. The roof above the fifth floor would use cool roof materials⁶ to decrease building energy use and would have an enclosed 16-foot-tall mechanical penthouse. The proposed building would also include three subsurface levels. Subsurface levels B1 and B2 and all above-ground levels would be built to the property lines on all sides of the building; subsurface level B3 would have about 6,315 square feet (sq. ft.) of unexcavated area at the southern end of the building. (See Figure II.2: Proposed Site Plan and Figure II.3: Proposed Building Sections.) The proposed design would be contemporary in style, with the building's Market Street façade articulated with a varied glass curtain wall system that maximizes interior daylight (see Figure II.4: Proposed Elevation, Market Street). The ground-floor retail storefronts along Market Street would have clear glazing to enhance light and transparency. The building's Stevenson Street façade would be sheathed in a painted aluminum curtain wall system; this façade would be less articulated than the main Market Street façade (see Figure II.5: Proposed Elevation, Stevenson Street). The mechanical penthouse level would also be sheathed in painted aluminum cladding on all sides.

The Market Street façade would include a centrally located main entrance with six sets of double doors opening on to the Market Street sidewalk. The main entrance would lead to a common five-level atrium with an escalator, the main stairs, and elevators. The common atrium would connect directly to two of the ground-floor retail spaces (Retail Spaces A and B, shown on Figure II.6: Proposed Ground Floor Plan), and would provide access to the other retail levels and parking levels via a combination of elevators, stairs, and escalator.⁷ In addition, the Market Street façade would include three secondary entrances, which would lead directly from the Market Street sidewalk to individual ground-floor retail spaces (Retail Spaces A, B, and C, shown on Figure II.6). Two of these direct retail entrances at the ground floor would be located in the

⁵ *Planning Code* §102.11 requires that additional gross floor area be added to the building because its average floor to ceiling height exceeds 15 feet. This requirement would result in the addition of 46,063 gsf for purposes of FAR calculation.

⁶ A high solar reflectance is the most important characteristic of a cool roof as it helps to reflect sunlight and heat away from a building, reducing roof temperatures. This typically translates into the use of white roof membrane.

⁷ Current building plans show that six retail tenants are expected to occupy the proposed building; however, this arrangement is subject to change in the future.

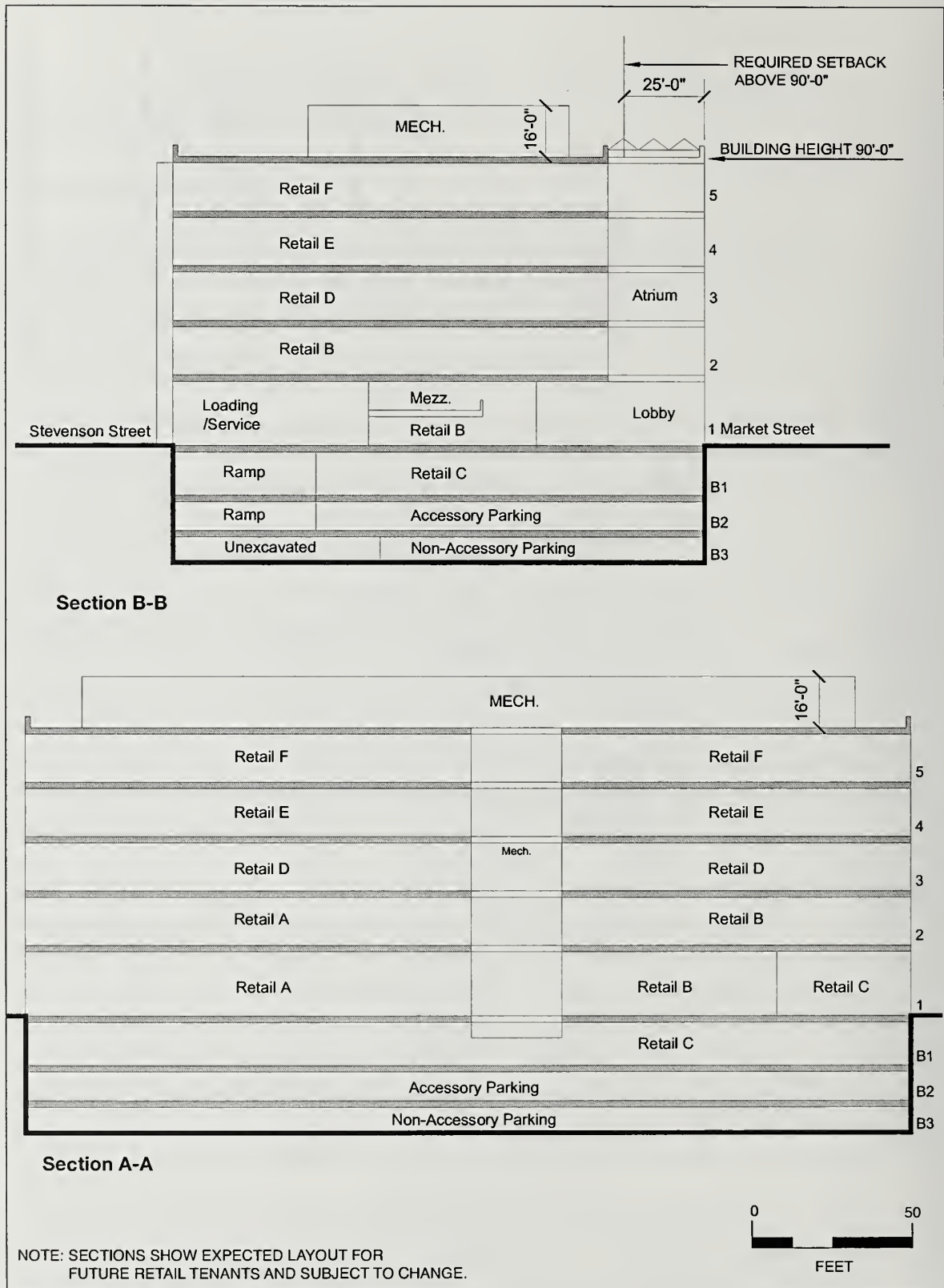


SOURCE: Gensler, Turnstone Consulting

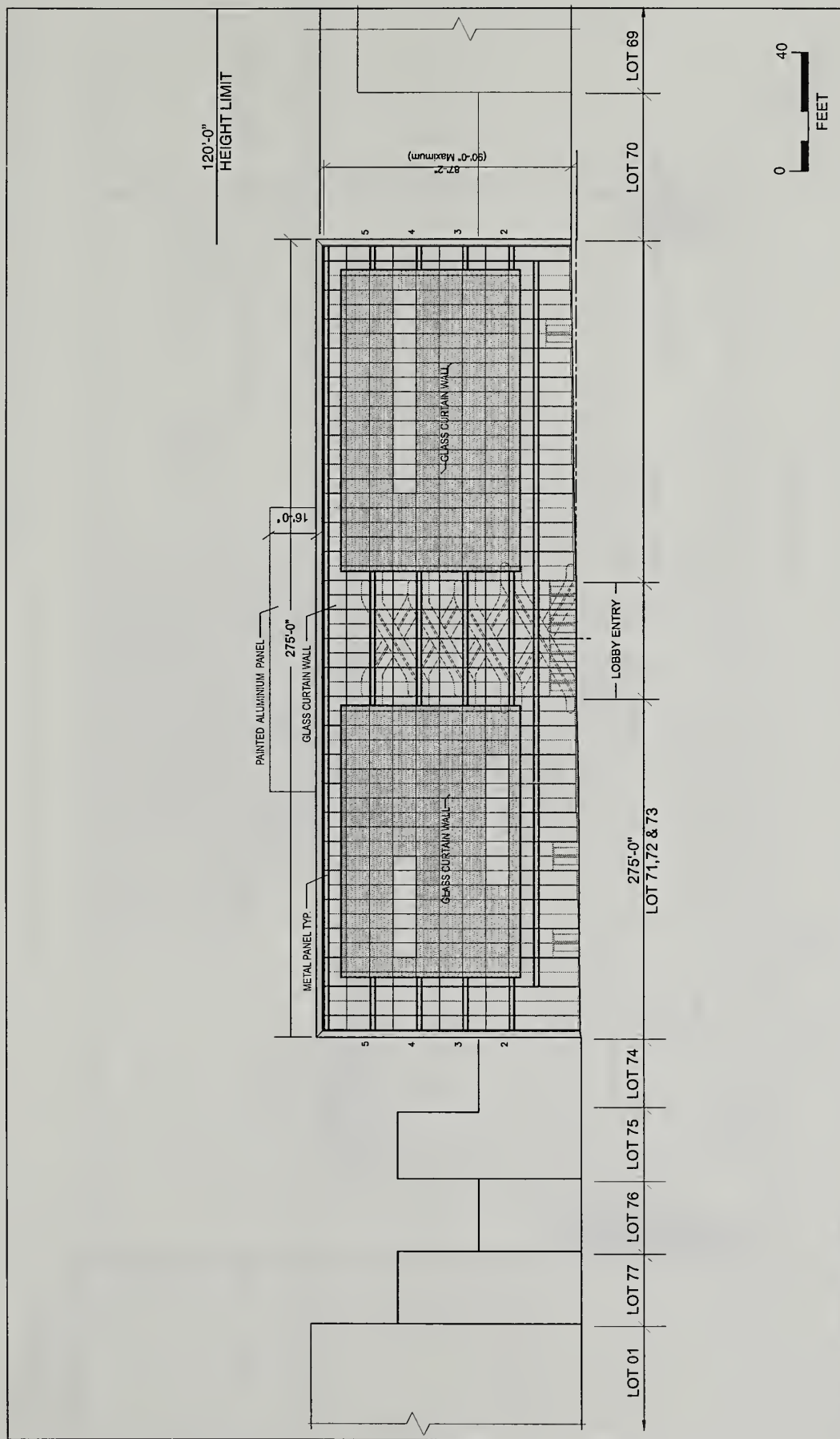
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FIGURE II.2: PROPOSED SITE PLAN



SOURCE: Gensler, Turnstone Consulting

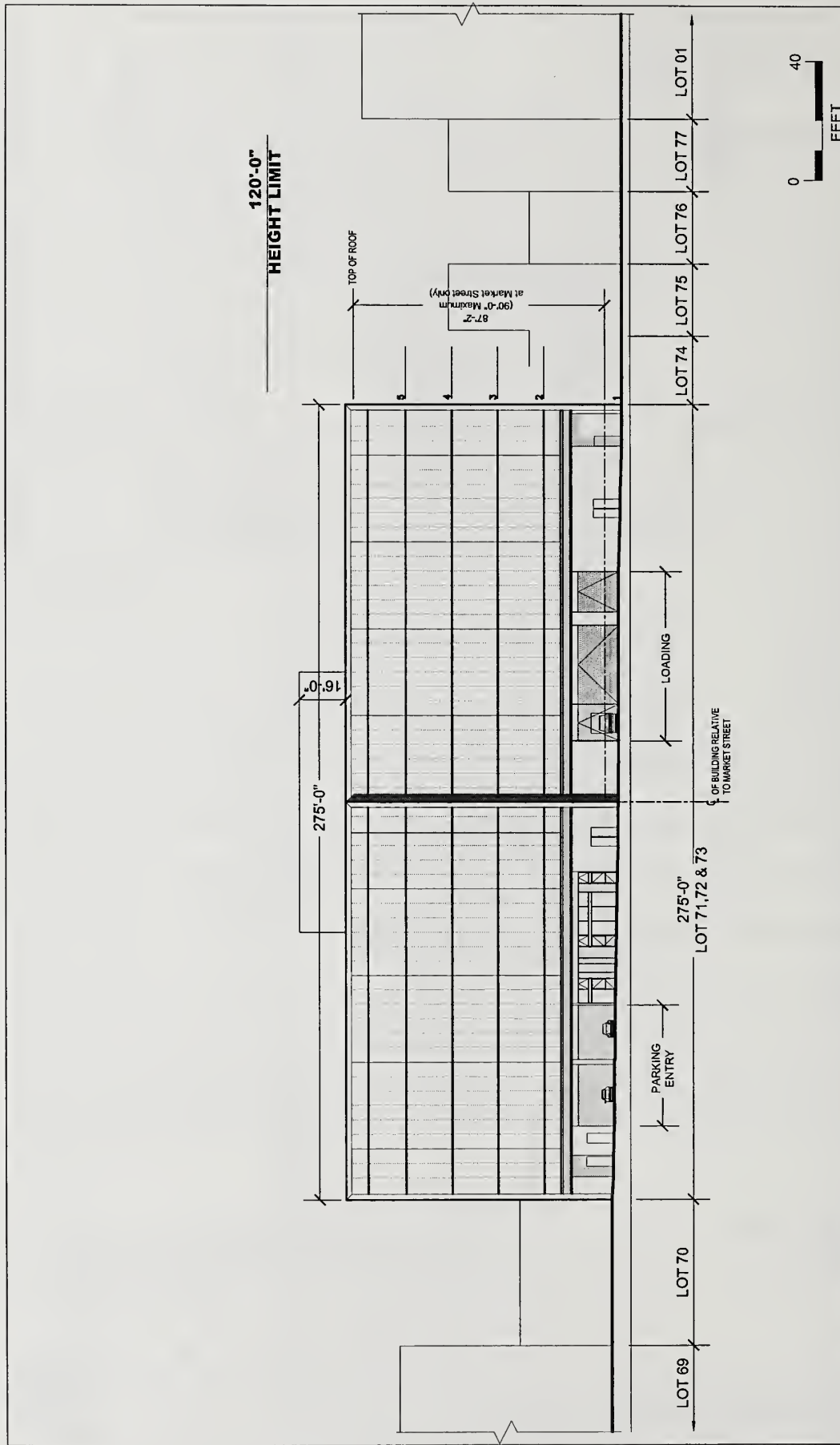


SOURCE: Gensler, Turnstone Consulting

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FIGURE II.4: PROPOSED ELEVATION, MARKET STREET

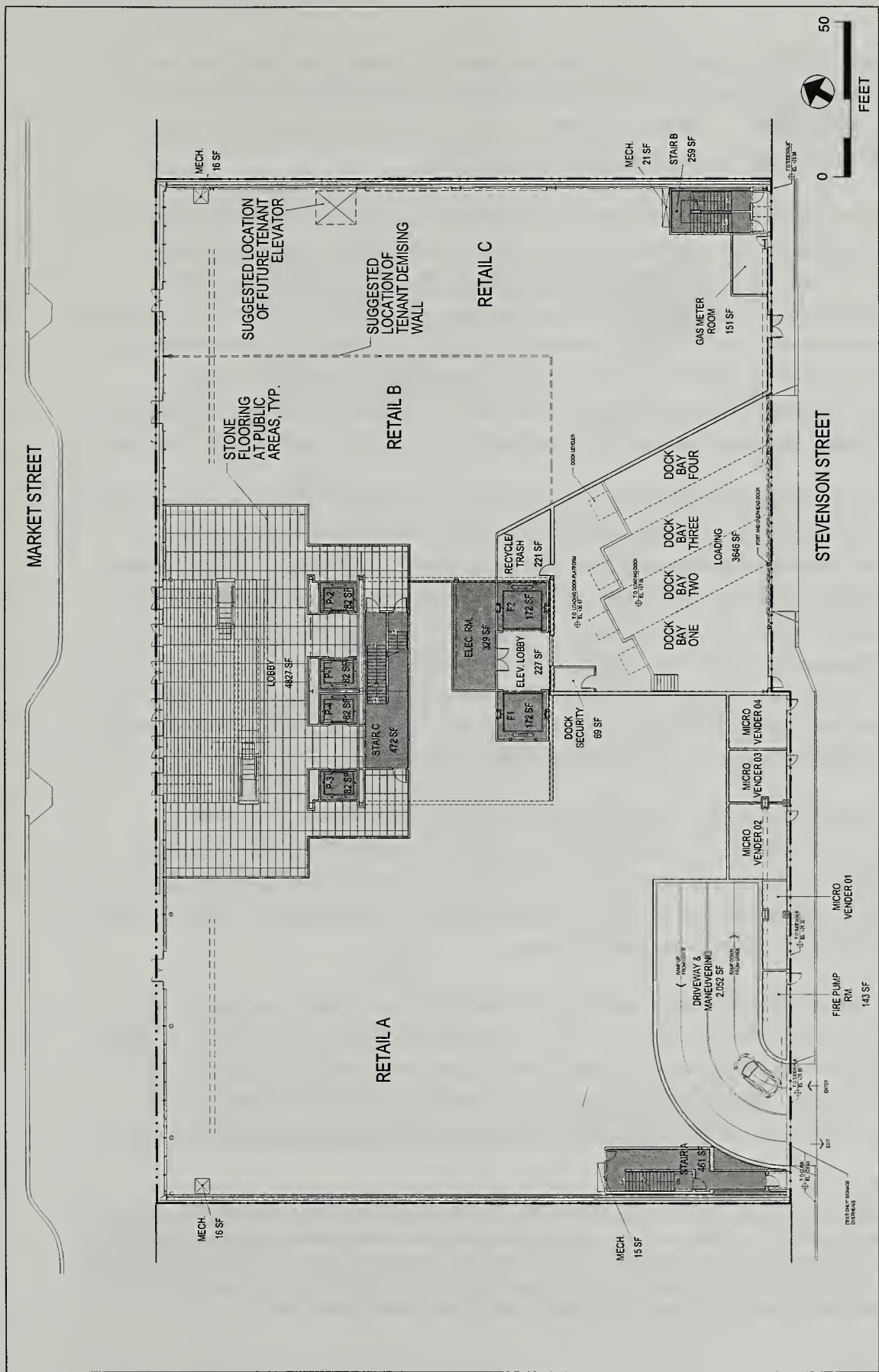


SOURCE: Gensler, Turnstone Consulting

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FIGURE II.5: PROPOSED ELEVATION, STEVENSON STREET



SOURCE: Gensler, Turnstone Consulting

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FIGURE II.6: PROPOSED GROUND FLOOR PLAN

eastern portion of the proposed building, and one would be located in the western portion. The project's vehicular and loading area driveways would be located at the rear of the project site along Stevenson Street. As shown on Figure II.6, one or more commercial entrances for microvendors may also be provided along Stevenson Street.

The Stevenson Street frontage at the rear of the project site is proposed to accommodate access to an area reserved for "microvendors," which are small retail businesses that would typically operate on the street (e.g., a flower kiosk or newsstand). The microvendor area would be approximately 670 gsf, and would include space and separate entrances for three or four vendors. The microvendor area would be located between the parking garage entrance and the loading dock entrance. If the microvendor area is not approved by the San Francisco Planning Department, a portion of the space would be combined with the larger retail space to take that space through to Stevenson Street and the remainder would likely be used for building services.

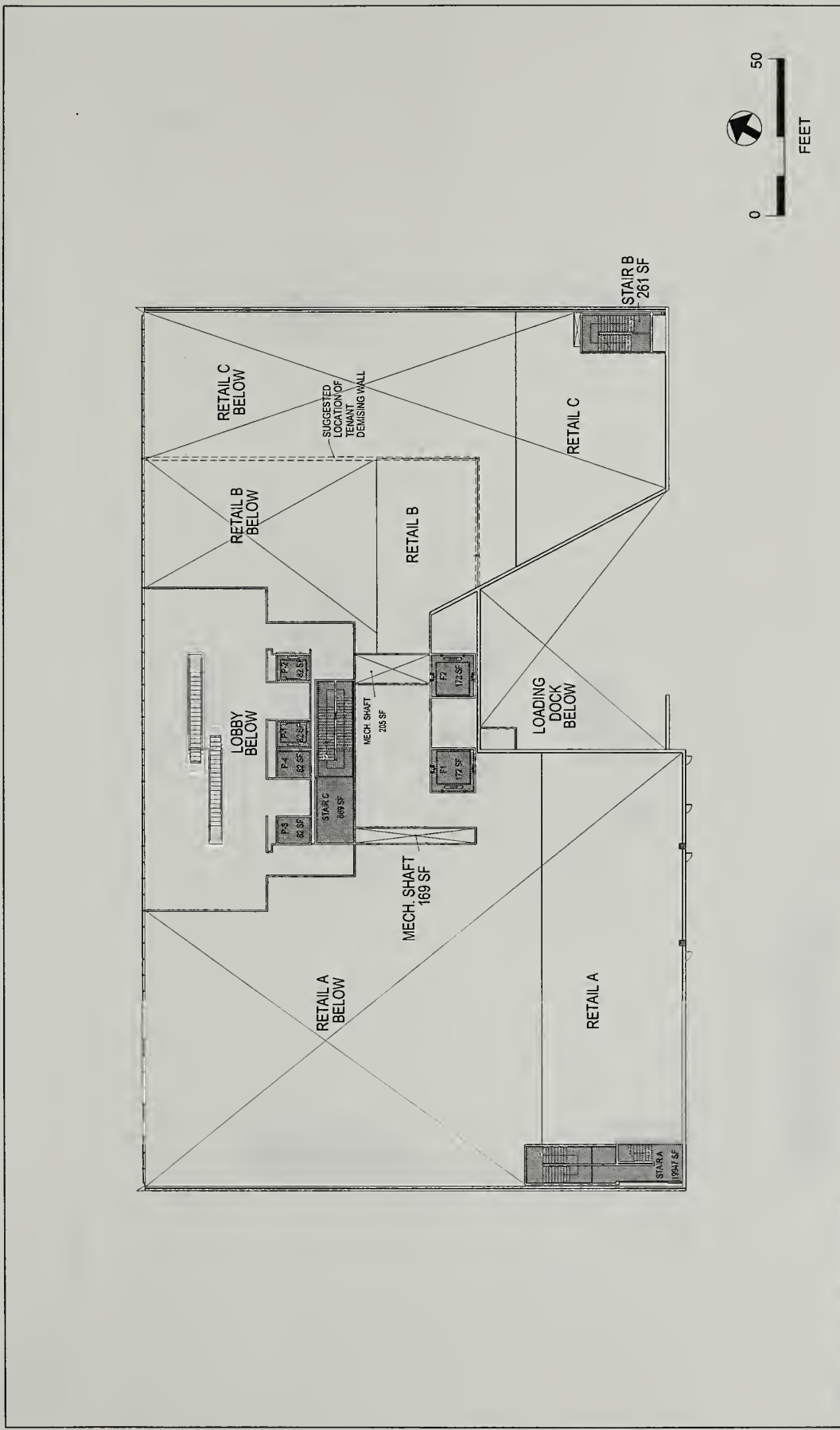
The 24-foot-tall ground level and mezzanine of the proposed building would have approximately 44,900 gsf of retail space, with about 34,660 gsf on the ground level and 10,240 gsf on the mezzanine. The project sponsor anticipates that the proposed ground-level retail space would include multiple tenant spaces; currently, it is anticipated that the proposed ground-level retail space would be divided among three retail tenants (see Figure II.6, p. II.11, and Figure II.7: Proposed Mezzanine Plan). The proposed ground-level retail space may be configured for more tenants. All of the ground-level retail spaces would have individual street access directly from the Market Street sidewalk (see Figure II.4, p. II.9). Some of the ground-level retail spaces may also have individual street access from the Stevenson Street sidewalk (see Figure II.5, p. II.10).⁸

The first basement level (B1) would be designed to accommodate one retail tenant in approximately 39,600 gsf (see Figure II.8: Proposed First Basement Floor (B1) Plan). The project sponsor currently anticipates that this basement-level retail space would be utilized by a ground-floor retail tenant. Part of floor B1 (approximately 4,310 gsf of space) would be used for the ramps leading to and from the parking garage.

Floors 2 through 5, the mezzanine, and floor B1 would be entirely retail in use and would be connected by stairs, escalators and elevators to the ground-level retail floor. Floors 2 through 5 would each have approximately 44,875 gsf of retail space (see Figure II.9: Proposed Typical Retail Floor Plan). The final number of tenants and demising plan⁹ for the tenants will be determined at the time the building is leased. Currently, it is anticipated that there would be six

⁸ The ground-floor design shows five entrances/exits along Stevenson Street in addition to those for the microvendor spaces. Two of the Stevenson Street entrances/exits would connect directly to stairs leading to the proposed building's upper levels and would be primarily emergency exits. One or more additional entrances may lead directly to ground-floor retail space, and another would lead to the loading dock area.

⁹ A demising plan shows the location of non-bearing walls that separate tenant space.

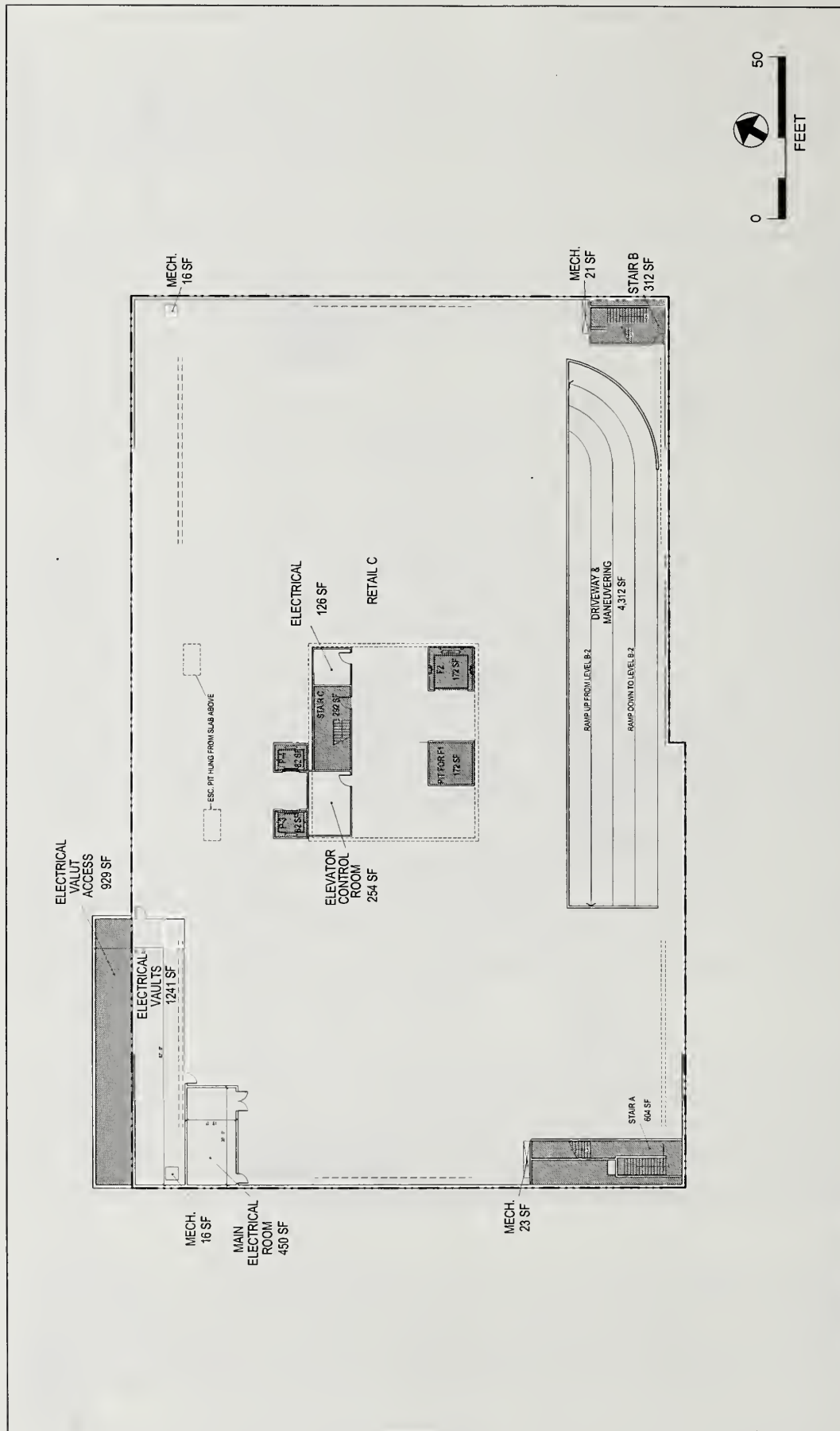


SOURCE: Gensler, Turnstone Consulting

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FIGURE II.7: PROPOSED MEZZANINE PLAN



SOURCE: Gensler, Turnstone Consulting

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FIGURE II.8: PROPOSED FIRST BASEMENT FLOOR (B1) PLAN

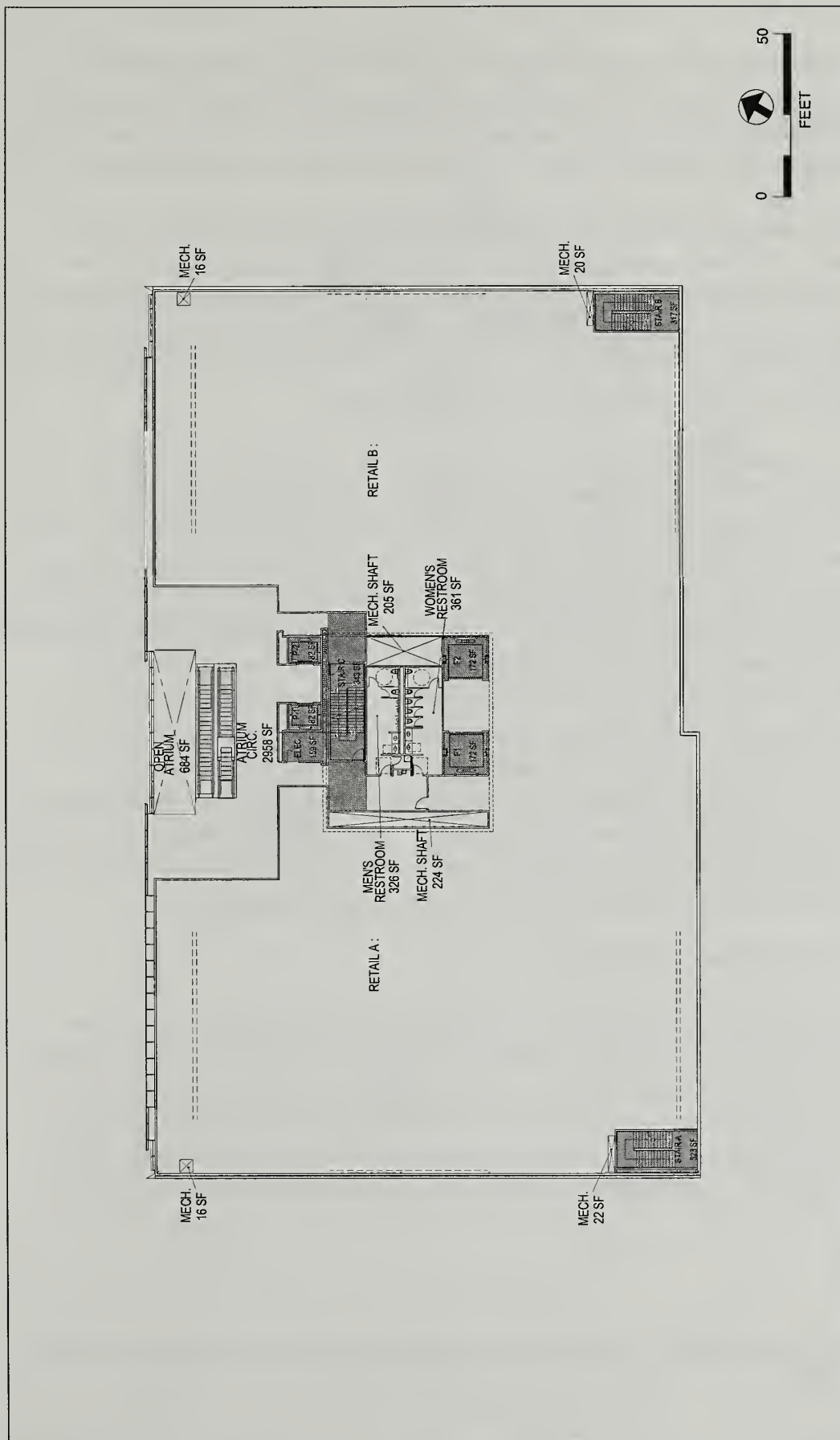


FIGURE II.9: PROPOSED TYPICAL RETAIL FLOOR PLAN

SOURCE: Gensler, Turnstone Consulting

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tenants in total. Three different retail tenants would occupy the third, fourth, and fifth floors. Basement level one, the ground floor, and the second floor would be designed to accommodate three retail tenants in total with one at basement level, a mix of three at the ground floor, and two on the second floor (see Figure II.3, p. II.8). The proposed retail space may also include a café.¹⁰

In addition to retail uses, the ground level would be occupied by an approximately 4,830-gsf atrium lobby with elevators, escalators, and stairs; approximately 360 gsf of mechanical and storage space; an approximately 4,160-gsf, four-space loading dock; and an approximately 2,050-gsf parking garage driveway along Stevenson Street. The pedestrian entrance to the atrium lobby would be from Market Street. It is possible that all of the multi-level retail spaces in the proposed building would have their own dedicated escalators and elevators.

The parking garage driveway entrance/exit and loading docks would be located at the rear of the building and would be accessible from Stevenson Street. One of the loading docks would be occupied by the building trash collection facility and would be accessible to garbage route trucks. Two of the three subsurface levels (floors B2 and B3) would be occupied by a parking garage. (See Figure II.10: Proposed Second Basement Floor (B2) Plan and Figure II.11: Proposed Third Basement Floor (B3) Plan.) The parking garage would provide approximately 201 independently accessible retail parking spaces; with valet parking, the garage would accommodate up to approximately 240-280 vehicles. Four parking spaces are reserved for exclusive use as car-sharing parking spaces. The proposed parking garage will not be free of charge to the public. The garage will require patrons to pay for parking subject to the rate structure required by *Planning Code* §155(g). A minimum of 21 secure bicycle parking spaces (10 more than required by the *Planning Code*) would be provided on floor B2. Shower and locker facilities for bicyclists are provided on floor B2. There would also be a small office for parking garage staff at this level. A portion of floor B3 (approximately 6,315 sq. ft.) would remain unexcavated.

Access, Site Circulation, and Loading

Vehicular access to the parking garage would be via a two-way ramp from Stevenson Street, which is currently one-way eastbound. Pedestrians would access the building from the common atrium lobby and the individual retail space entrances along Market Street. There may be street-level access from Stevenson Street to one or more of the ground-level retail spaces as well as access to the microvendor spaces. The proposed loading area would be accessed directly from Stevenson Street and would include three full-size spaces for trucks and one space for garbage handling.

¹⁰ The retail spaces described here total 264,000 gsf, which is slightly different from the total in Table II.1 due to rounding.

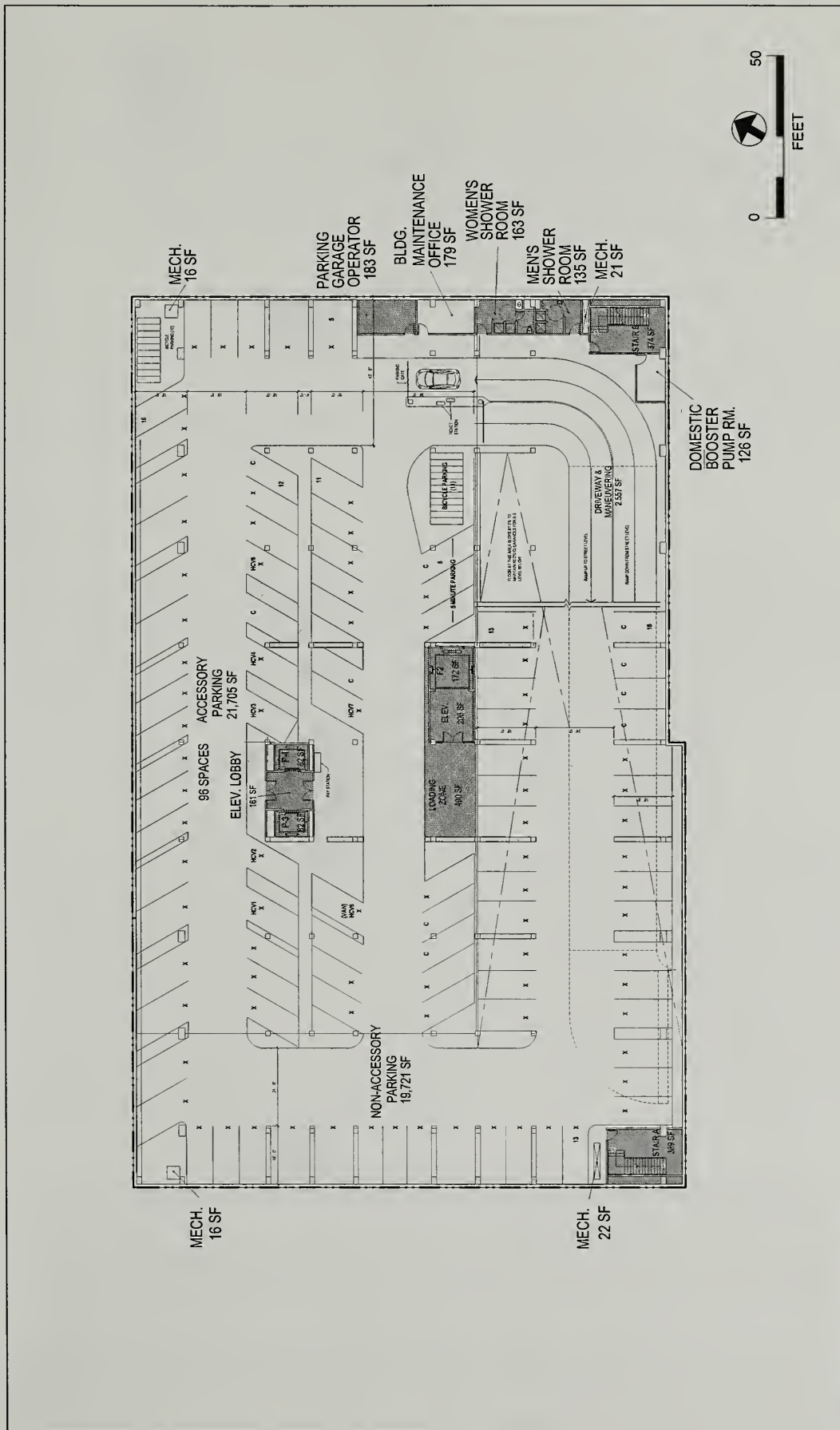
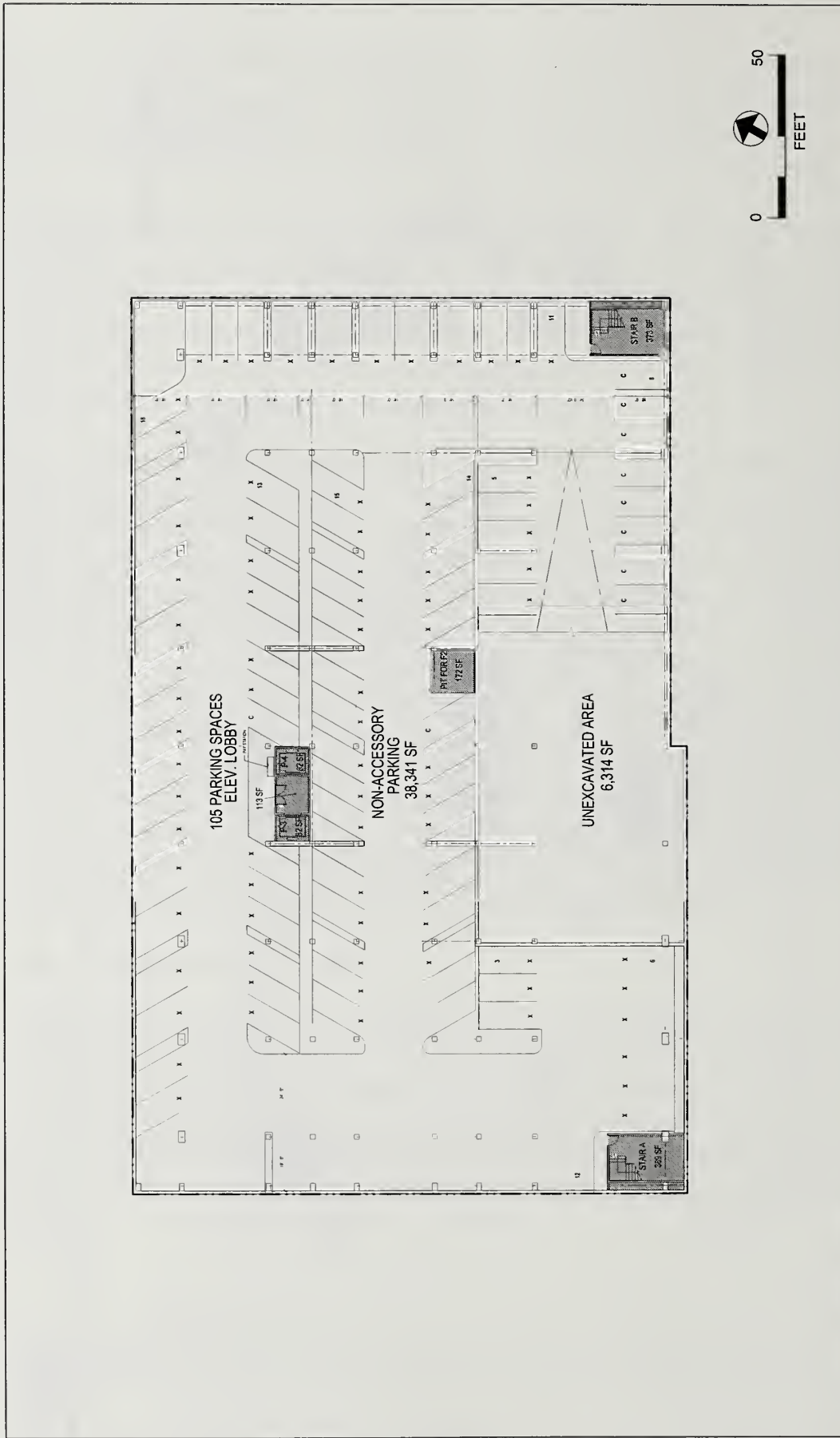


FIGURE II.10: PROPOSED SECOND BASEMENT FLOOR (B2) PLAN

SOURCE: Gensler, Turnstone Consulting

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SOURCE: Gensler, Turnstone Consulting

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FIGURE II.11: PROPOSED THIRD BASEMENT FLOOR (B3) PLAN

Proposed Landscaping

The project sponsor would retain the existing street trees along Market Street. Along Stevenson Street, the project sponsor proposes to remove the existing bollards at the project frontage and install street trees, planters, and public art. Five existing on-street parking spaces would be eliminated along the south side of Stevenson Street to accommodate this new landscaping.

Foundation and Earthwork

The project would use a mat foundation. Proposed excavation would be up to about 41 feet deep¹¹ (about 31 feet deeper than the existing basement). Approximately 50,500 cubic yards of soil would be removed from the site; however, approximately 6,315 sq. ft. would remain unexcavated at the B3 level.

Project Schedule

The project sponsor, Urban Realty Co., Inc., estimates that construction of the proposed project would take approximately 25 months, including six months for demolition, excavation, and shoring activities. The estimated construction cost is approximately \$60 million. If the proposed project is approved, construction is anticipated to start in spring 2010. Based on the estimated construction schedule, occupancy is expected to begin in summer 2012.

F. INTENDED USES OF THE EIR

An EIR is an informational document that is intended to inform the public and the decision-makers of the environmental consequences of a proposed project and to present mitigation measures and feasible alternatives to avoid or reduce the environmental effects of that project. It examines the potential significant physical environmental impacts that could result from the proposed project. This EIR provides the environmental information and evaluation necessary for decision-makers to approve the proposed CityPlace project. This Draft EIR has been prepared by the City and County of San Francisco, pursuant to the California Environmental Quality Act (California Public Resources Code Sections 21000 et seq., and California Code of Regulations Title 14, Sections 1500 et seq., "*CEQA Guidelines*"). This EIR is a project-level EIR. That is, it analyzes implementation of the proposed project at a project-specific level.

Before any discretionary project approvals may be granted for the project, the Planning Commission must certify the EIR as adequate, accurate, and objective. This Draft EIR will undergo a public comment period as noted on the cover, during which time the Planning Commission will hold a public hearing on the Draft EIR. Following the close of the public

¹¹ Approximately 37 feet would be for the three subsurface levels, plus four feet for foundations.

comment period, the Planning Department will prepare and publish a Summary of Comments and Responses, containing a summary of all substantive comments received that raise environmental issues and the Department's responses. It may also contain specific changes to the Draft EIR text. The Draft EIR, together with the Summary of Comments and Responses, including revisions to the Draft EIR, if any, will be considered by the Planning Commission in a public meeting and presented to the Planning Commission for certification. The Commission and other decision-makers will consider the information in the Final EIR in their deliberations on the project. As noted, no approvals or permits may be issued prior to EIR certification.

Approvals Required

- The proposed project is located in a C-3 District and would be subject to *Planning Code* Section 309, Permit Review in C-3 Districts. The project sponsor would request the following exception under Section 309:
 - An exception to the requirements for freight loading spaces. (Sections 152.1, 161(i), and 309(a)(8))
- The proposed project would require Conditional Use authorization for retail parking that is in excess of permitted accessory parking. (Sections 157, 158, 223(m), 204.5)
- The proposed project would require Conditional Use authorization for demolition of a former theater use. (Section 221.1)
- The proposed project would require a variance from the requirement of Section 155(s)(5)(A) limiting a project to two façade openings of no more than 11 feet wide or one opening of no more than 22 feet wide for access to off-street parking.
- The proposed project would require a variance from the requirement of Section 155(s)(5)(A) limiting a project to one façade opening of no more than 15 feet wide for access to off-street loading.
- The proposed project would require a variance from the requirement to add 46,063 to the total gross floor area resulting from an average floor-to-ceiling height in excess of 15 feet. This variance would decrease the total amount of TDRs required to be purchased by the project sponsor. (Section 102.11)
- The proposed building would exceed the base FAR of 6:1. Therefore, the proposed project would require, as a condition of approval, proof that the TDRs have been recorded against the title of property before issuance of certain building permits.
- The proposed project would require approval of a merger of the three existing lots into one lot by the San Francisco Department of Public Works.
- The proposed project would be subject to permit and plan review by San Francisco Department of Building Inspection.

III. PLANS AND POLICIES

For informational purposes, this section provides a summary of plans and policies of the City and County of San Francisco (City), and regional, state, and federal agencies that have policy and regulatory control over the project site, and assesses the proposed project's potential for conflicts with these plans and policies.

SAN FRANCISCO PLANS AND POLICIES

Priority Policies

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City *Planning Code* to establish eight Priority Policies. These policies are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) landmark and historic building preservation; and (8) protection of open space. The case report and approval motions for the proposed project will contain the Planning Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies. The proposed project was reviewed against the Priority Policies and no inconsistencies were identified.

San Francisco General Plan¹

The *San Francisco General Plan (General Plan)*, which provides general policies and objectives to guide land use decisions, contains some policies which relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy. In general, potential conflicts with the General Plan are considered by decision makers independently of the environmental review process, as part of the decision whether to approve or disapprove a proposed project. Any potential conflict not identified here could be considered in that context, and would not alter the physical environmental effects of the proposed project.

The project site is located within the boundaries of the *Downtown Area Plan*,² an Area Plan of the *General Plan*. Centered on Market Street, the *Downtown Area Plan* area is roughly bounded by Van Ness Avenue to the west, The Embarcadero to the east, Folsom Street to the south, and the northern edge of the Financial District to the north. The project site is located in the area of the

¹ *San Francisco General Plan* at http://www.sfgov.org/site/planning_index.asp?id=41423, accessed February 1, 2009.

² *San Francisco General Plan, Downtown Area Plan*, at http://www.sfgov.org/site/planning_index.asp?id=41405, accessed February 1, 2009.

Downtown Area Plan known as the Downtown core and is designated on the Downtown Land Use and Density Plan Map as General Commercial. The objectives and policies of the *Downtown Area Plan* were reviewed against the proposed project and no inconsistencies were identified.

Other local plans and policies reviewed against the proposed project were the *San Francisco Sustainability Plan*, the San Francisco Transit First Policy, the Transit Effectiveness Project,³ and the *San Francisco Bicycle Plan*. The proposed project would not conflict with the policies and objectives in these plans.

SAN FRANCISCO PLANNING CODE

The San Francisco *Planning Code* (*Planning Code*), which incorporates by reference the City's Zoning Maps, implements the *General Plan* and governs permitted uses, densities, and configuration of buildings within the City. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless (1) the proposed project conforms to the *Planning Code*, (2) allowable exceptions are granted pursuant to provisions of the *Planning Code*, or (3) amendments to the *Planning Code* are included as part of the project. The discussion in the Initial Study (Appendix A, pp. 19-21) identifies exceptions, variances, and conditional use authorizations needed for the proposed project. The proposed project does not seek any *Planning Code* amendments and is therefore consistent with the *Planning Code*.

REGIONAL PLANS AND POLICIES

The five principal regional planning agencies and their policy plans that guide planning in the nine-county Bay Area are (1) the Association for Bay Area Governments' A Land Use Policy Framework and *Projections 2009*, (2) the Bay Area Air Quality Management District's (BAAQMD) *Clean Air Plan* (CAP) and *Bay Area 2005 Ozone Strategy*, (3) the Metropolitan Transportation Commission's *Regional Transportation Plan* (RTP) – Transportation 2030, (4) the San Francisco Regional Water Quality Control Board's (RWQCB) *San Francisco Basin Plan*, and (5) the San Francisco Bay Conservation and Development Commission's (BCDC) *San Francisco Bay Plan*. Due to the size, location, and nature of the proposed project, there would be no anticipated conflicts with regional plans.

³ Recommendations of the Transit Effectiveness Project were endorsed by the SFMTA Board on October 21, 2008. Environmental assessment is ongoing.

IV. ENVIRONMENTAL SETTING AND IMPACTS

Based on the Initial Study published on October 1, 2008, the San Francisco Planning Department determined that an Environmental Impact Report (EIR) was required. The Initial Study determined that the following effects of the project would either be less than significant or would be reduced to a less-than-significant level by mitigation measures included in the project and thus required no further analysis. These topics are Population and Housing; Cultural and Paleontological Resources; Transportation and Circulation (air traffic patterns); Noise (groundborne vibration, construction noise, aircraft noise, interior noise levels); Air Quality (construction air quality, odors, greenhouse gas emissions); Wind and Shadow; Recreation; Utilities and Service Systems; Public Services; Biological Resources; Geology and Soils; Hydrology and Water Quality; Hazards/Hazardous Materials; Mineral/Energy Resources; and Agricultural Resources. CEQA does not require further assessment of the environmental effects that would be less than significant; therefore, the EIR does not discuss these effects (see Appendix A for the Initial Study). The proposed project's effects on Land Use and Aesthetics were also determined to be less than significant. These topics are included in the EIR to assist the reader and provide details about the proposed project. In addition, construction-related and operational-related emissions are re-evaluated in this Draft EIR as they relate to criteria air pollutants and greenhouse gases pursuant to the proposed new or updated thresholds of significance circulated by the BAAQMD in *California Environmental Quality Act Draft Air Quality Guidelines*, September 2009 and the Revised Draft Options and Justification Report in October 2009.

A. LAND USE

For informational purposes, this section presents the existing land uses in the vicinity of the proposed project and discusses the compatibility of the proposed project with surrounding uses. As discussed in the Initial Study (see Appendix A), the proposed project would not physically divide an established community, conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating and environmental effect, or result in a substantial impact on the character of the vicinity. Chapter II, Project Description, lists the approvals required for the project. Chapter III, Plans and Policies, discusses relevant plans, policies, and regulations of agencies with jurisdiction over the project site.

SETTING

The project block is bounded by Market Street on the north, Fifth Street on the east, Mission Street on the south, and Sixth Street on the west. Stevenson Street, an east-west alley, bounds the project site on the south. The 1.06-acre project site is located on Lots 71, 72, and 73 on

Assessor's Block 3704. The rectangular project site is in the middle of the block and is currently developed with three vacant mixed-use commercial buildings: 935-939 Market Street, 941-945 Market Street, and 947-965 Market Street. The 935-939 Market building is 94 feet tall and has five stories; the 941-945 Market building is 30 feet tall and has two stories; and the 947-965 Market building is 45 feet tall and has two stories.

Along Market Street, the project block is occupied by a large five-story retail building, the historic Hale Brothers Department Store at 901 Market Street,¹ located at the intersection of Market and Fifth Streets; several two- to six-story commercial buildings located mid-block; and a 16-story office building with ground-floor retail at One Sixth Street, located at the intersection of Market and Sixth Streets. Immediately east of the project site is a two-story retail building currently occupied by Sheikh Shoes, and immediately west of the project site is a two-story retail building currently occupied by Pearl Art and Craft Supplies.

Overall, the project vicinity is a retail, entertainment, hotel, and cultural activities center serving residents and visitors. Neighboring blocks immediately north of the project block across Market Street are occupied by several two- to nine-story commercial buildings (combination of office and retail), interspersed with theaters, entertainment uses (adult entertainment and clubs), and parking.² Specifically, the block bounded by Mason, Eddy, Cyril Magnin, and Market Streets, located across Market Street and northeast of the project site, is occupied on the Market Street frontage by the historic eight-story Mechanic's Savings Bank Building at 944-948 Market Street, the seven-story Garfield Building at 938-942 Market Street with office space above ground-floor retail,³ a one-story retail building, an eight-story office building at One Hallidie Plaza, the four-story Bristol Hotel at the corner of Mason and Eddy Streets, and a three-story office building at 34 Mason Street. The triangular block bounded by Turk, Taylor, and Market Streets, located across Market Street and northwest of the project site, is occupied by the two-story Dean Building with seven in-line retail spaces below offices, three vacant two- to three-story commercial buildings (966-976 Market Street), the Crazy Horse Gentleman's Club at 980 Market Street, the Fox Warfield Theater at 982 Market Street, the seven-story Warfield Building (988 Market Street) with ground-floor retail (several of which are vacant), and a surface parking lot located at the intersection of Taylor and Turk Streets behind Market Street.

A large portion of the block immediately east of the project block and across Fifth Street is occupied by the eight-story Westfield-San Francisco Centre shopping mall at 865 Market Street.

¹ Currently, the 901 Market Street building is partially occupied by Marshalls department store.

² In the South of Market area, streets that run in the northwest/southeast direction, such as Fifth and Sixth Streets, are generally considered north-south streets, whereas streets that run in the northeast/southwest direction, such as Market and Stevenson Streets, are generally considered east-west streets.

³ An addition and change of use (from office above ground-floor retail to residential above ground-floor retail use) was approved in 2004 for the existing seven-story building at 938-942 Market Street; this building is located at the northeastern corner of Market and Mason Streets.

The remaining portion of this block is occupied by some mid-rise commercial buildings and hotels, including a ten-story office above ground-floor retail (Walgreens) building; an eight-story building with retail on the lower floors (Old Navy store) and a hotel use above (Hotel Palomar); and an eight-story hotel (Hotel Milano). Across Mission Street to the south of this block is the Fifth & Mission/Yerba Buena Garage, which has 2,585 parking spaces on eight floors and ground-floor retail uses.

South of the project site the area bounded by Fifth Street, Stevenson Street, Sixth Street, and Jessie Street is occupied by several two- to five-story buildings with residences above ground-floor retail space along Sixth Street; the Nordstrom surface parking lot; the NRG Thermal steam plant that supplies steam to buildings in a 2-square-mile area; nine two- to ten-story newly renovated live/work loft buildings with some ground-floor retail (410-424 Jessie Street); and a five-story office building (12 Mint Plaza) at the intersection of Jessie and Mint Streets. The two-story historic U.S. Mint building, with a small plaza along Fifth Street and Mint Plaza on the former Jessie Street right-of-way between Mint Street and Fifth Street, is located immediately south of Jessie Street between Fifth and Mint Streets. The U.S. Mint building is planned for redevelopment with cultural and commercial uses. The area farther south, generally between Jessie and Mission Streets west of Mint Street, is occupied by low- and mid-rise office buildings with retail uses on the ground floor.⁴ The block to the west of the project block across Sixth Street is occupied by several two- to seven-story buildings with a mix of uses (commercial, residential, and hotel).

In the greater project vicinity, Union Square is about four blocks to the northeast (north of Geary Street); the cable car turnaround at Market and Powell Streets is about one block to the northeast; and the Hallidie Plaza BART/MUNI station entrance is one-half block to the northeast. The western boundary of the Yerba Buena Center Redevelopment Area includes the mid-block portion of the block between Fifth and Fourth Streets, about one block to the east of the project site. The Tenderloin neighborhood starts about one-half block to the northwest, and the Civic Center is three to four blocks to the northwest.

IMPACTS

The proposed project's retail use would be consistent with the existing land uses in the area. There are no significant land use impacts that would result from implementation of the proposed project.

⁴ The University of California, San Francisco, a former tenant of the 939 Market Street building on the project site, relocated to the 980-984 Mission Street building, which is south of the project site.

B. AESTHETICS

The Setting discussion of this section describes the existing visual character of the CityPlace project site and its immediate vicinity; presents and describes photographic views of existing conditions of the project site and its visual setting; and identifies existing visual resources in the area that could be potentially affected by the proposed project.

Potential impacts of the project on visual quality, scenic vistas, scenic resources, and light and glare were determined to be less than significant in the Notice of Preparation/Initial Study (see Appendix A), but a discussion of the proposed changes to the project site has been included for informational purposes to provide more detail regarding the proposed building in its context.

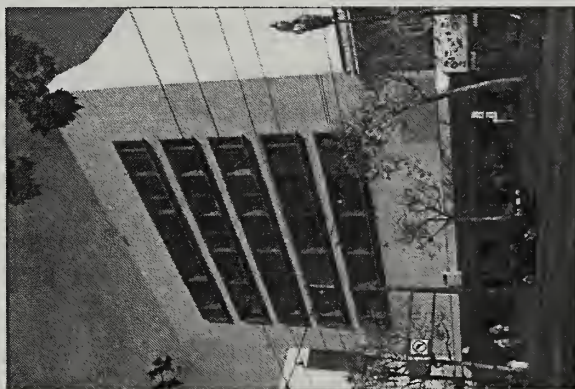
SETTING

VISUAL CHARACTER OF THE PROJECT SITE AND ITS ENVIRONS

Project Site

The project site, which is within the densely developed Market Street corridor, is developed with three buildings ranging in height from 30 feet to 94 feet that were originally constructed between 1901 and 1909 (see Figure IV.B.1: Existing Buildings on the Project Site). The tallest on-site building, at 935-939 Market Street, is the most prominent; the two other on-site buildings are relatively small within the streetscape. The front building façade of 935-939 Market Street, a five-story, 94-foot-high office building with ground-floor retail originally constructed in 1909, was extensively altered in the 1950's: the formerly brick and concrete building with Renaissance detailing and gray stone trimmings was remodeled into the existing form of a predominantly concrete vertical, flat façade with horizontal bands of windows.¹ The front building façade of 941-945 Market, a two-story, 30-foot-high office building with ground-floor retail originally constructed in 1909, was completely altered in the 1930's: the original building, which had a two-part vertical composition and Renaissance ornamentation, was remodeled with an Art Deco theme that left only the ornate cornice molding from the original 1909 design. The front building façade and storefronts of this building have undergone further alterations. The two-story, 45-foot-high building at 947-965 Market Street, originally constructed in 1901, was similarly designed with ornamentation and included a vaudeville theater. Over time it has been extensively altered to remove or cover key ornamentation with modern signage.

¹ Memorandum from Dan DiBartolo, Preservation Planner, to Debra Dwyer, Environmental Planner, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, November 1, 2007. A copy of this document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, as part of Case File No. 2005.1074E.



935-939 MARKET STREET



941-945 MARKET STREET



947-965 MARKET STREET

SOURCE: Gensler, Turnstone Consulting

CITYPLACE

2005.1074E

FIGURE IV.B.1: EXISTING BUILDINGS ON THE PROJECT SITE

Street trees line the northern boundary of the project site; none of these trees would be removed as part of the proposed project. There are no other natural scenic resources on the project site.

Project Vicinity

Structures along Market Street in the project area range from 1 to 16 stories high; the majority of structures have heights of two to eight stories. The broad width of Market Street and its use as a major thoroughfare contribute to the visual prominence of the buildings along this street. Market Street is the boundary between two street grid systems. South-of-Market streets run parallel or perpendicular to Market Street. The blocks on the south side of Market Street are long and run between numbered streets that meet Market Street at a right angle. The streets north of Market Street are not aligned with Market Street; they are aligned with the north, south, east, and west cardinal directions. North-of-Market Streets converge with Market Street obliquely; forming irregularly shaped blocks and lots, distinctive triangular “flatiron” buildings, and irregularly shaped plazas along the north side of Market Street. Buildings are built to the sidewalk, with full lot coverage and few setbacks between buildings. This pattern results in a long and regular street wall along the north side of Market Street. Since side streets on both sides of Market Street end or change axis at Market Street, views along these side streets toward Market Street often terminate with a view of a prominent building on the opposite side of Market Street.

The existing visual character of the south side of Market Street in the vicinity of the project site is varied yet cohesive. The overall development pattern is generally defined by grand-scaled commercial building forms interspersed with smaller-scaled commercial buildings. A variety of architectural styles are present, with many buildings designed in the historically-derived revival styles popular during the early twentieth century. Façades are characterized by a hierarchy of vertical elements (piers, columns, and mullions) and horizontal elements (cornices, band cornices, spandrels, sills and ground-level awnings) that organize the façades and contribute depth, shadow, and texture. Horizontal continuity between buildings of varying heights, widths, and architectural styles and materials is maintained with strongly expressed, projecting, horizontal elements that draw the eye across the façade. These often align with horizontal elements on adjacent façades, reinforcing the sense of perspective and drawing the eye down the street to where the lines converge at a “vanishing point” in the distance. Ground floors along Market Street are generally transparent and oriented to pedestrians. A unified scheme for street plantings and sidewalk paving materials further reinforce the visual continuity along this segment of Market Street.

Located along Stevenson Street are the rear service entries for buildings that front on Market Street. Architectural embellishment and articulation is minimal, in keeping with the functional and utilitarian functions at the rear of the buildings. Less effort is devoted to creating continuity with nearby buildings or appealing to pedestrians than on the front public faces of these buildings.

EXISTING SCENIC VISTAS AND SCENIC RESOURCES

This discussion of scenic vistas and scenic resources identifies important scenic views and visual features that are visible from nearby publicly accessible viewpoints. Public areas surrounding the project site consist of public streets and sidewalks as well as Hallidie Plaza and the cable car turnaround at the Market Street terminus of Powell Street.

In addition to being an important transportation corridor, Market Street is also an important view corridor. Looking east from the project site, Market Street offers an unobstructed view of the historic Ferry Building, approximately 10 blocks away. The view corridor is framed on both sides by existing development, with multi-story building façades forming a continuous street wall along the entire length of Market Street from the project site to The Embarcadero. Looking west from the project site, Market Street offers distant views of Twin Peaks.

Located one-half block northeast of the project site, Hallidie Plaza is an important transportation hub and public plaza that provides access to the subsurface Powell Street MUNI/BART Station. The plaza consists of east and west sections separated by Cyril Magnin Street. The east section of Hallidie Plaza, which was designed as a triple-story, partly below-grade landscaped plaza, includes a tourist information center and the turnaround for the historic cable cars at the intersection of Market and Powell Streets. The west section of the plaza is located between Market and Eddy Streets across Cyril Magnin Street from the east portion. The east portion of the plaza is dominated by the below-grade design of the plaza that provides access to local and regional transit. The scenic views from Hallidie Plaza are aligned with the Market Street corridor and framed by existing urban development. Given its triple-story sunken design, Hallidie Plaza offers few vantage points for unobstructed views along the Market Street corridor. Views from the cable car turnaround to the project site encompass the range of buildings in the surrounding area between the Westfield-San Francisco Centre and Sixth Street. The existing buildings on the project site are not notable from this vantage point.

Some of the buildings near the project site, including the historic Hale Brothers Department Store Building at 901 Market Street directly to the east, the Garfield Building and Mechanics Savings Bank Building across Market Street to the northeast, the Warfield Theater across Market Street to the northwest, and the Wilson Building and Hale Brothers Building directly to the west, are considered historic resources. These buildings are prominent features of the project area and, due to their historic and architectural merit, may also be considered scenic resources.

IMPACTS

SIGNIFICANCE CRITERIA

The City and County of San Francisco has not formally adopted significance standards for impacts related to visual quality. The Planning Department's Initial Study Checklist form provides the following list of topics to be considered in evaluating whether impacts related to visual quality merit further study in an EIR (see Appendix A, p. 28):

Would the project:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and other features of the built or natural environment that contribute to a scenic public setting;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties.

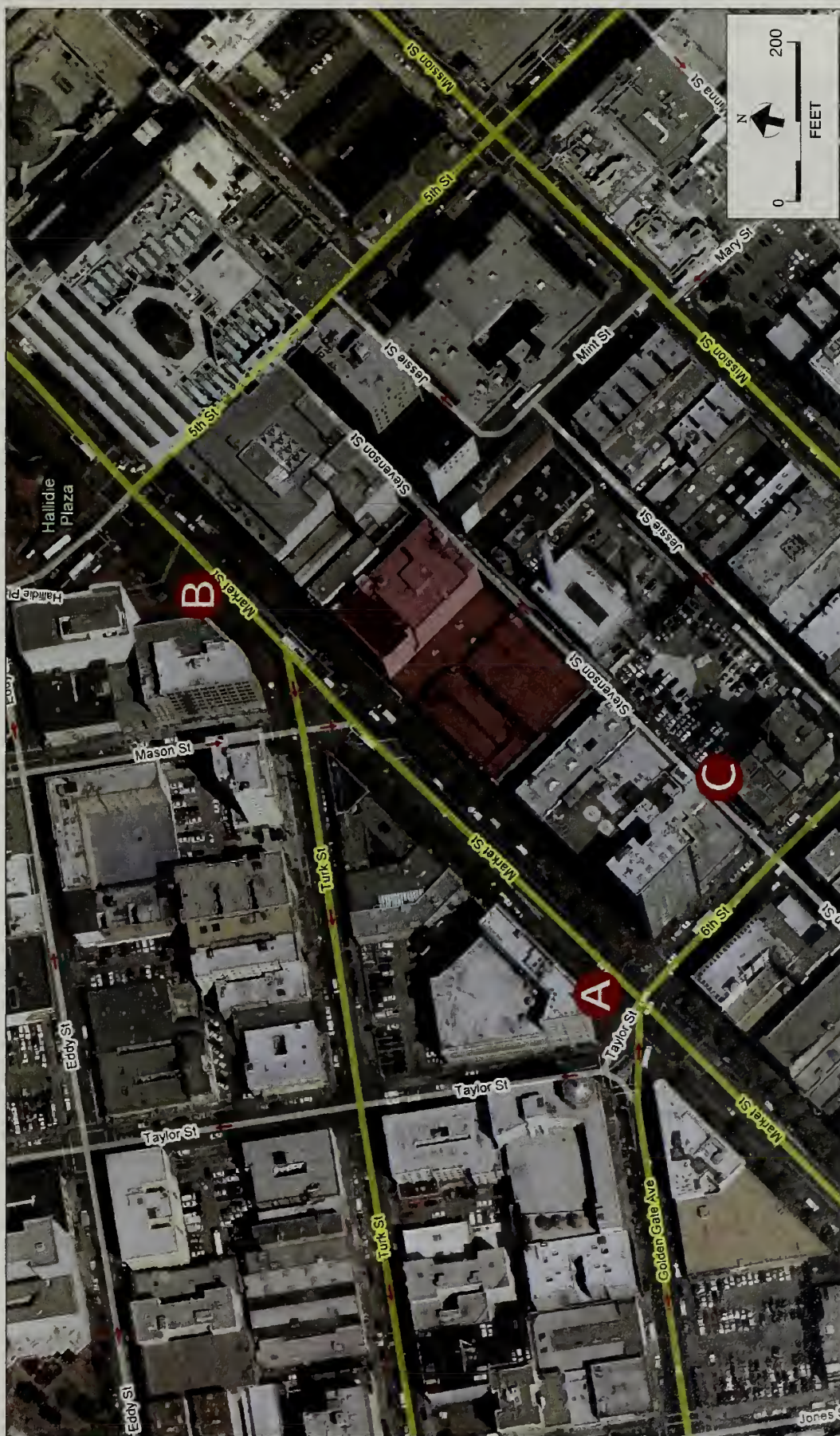
Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and members of the public. A proposed project would therefore be considered to have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change.

METHODOLOGY AND ASSUMPTIONS

An independent consultant photographed the project site from three publicly accessible vantage points around the project site (see Figure IV.B.2: Viewpoint Locations).² These baseline photographs are representative of existing visual conditions at and around the project site. (See Figures IV.B.3 (Viewpoint A), IV.B.4 (Viewpoint B), and IV.B.5A (Viewpoint C) (Existing).) The consultant has produced computer-generated photosimulations from project design data supplied by the project architect that are superimposed onto the baseline photograph. (See Figures IV.B.3, IV.B.4, and IV.B.5B (Proposed Project).³) These "before and after" images allow the reader to compare existing visual conditions at the project site with accurate and detailed visualizations of the proposed project placed within the visual context of the project site.

² Square One Productions, February 25, 2008.

³ Square One Productions, February 25, 2008.



SOURCE: Square One Productions; Turnstone Consulting

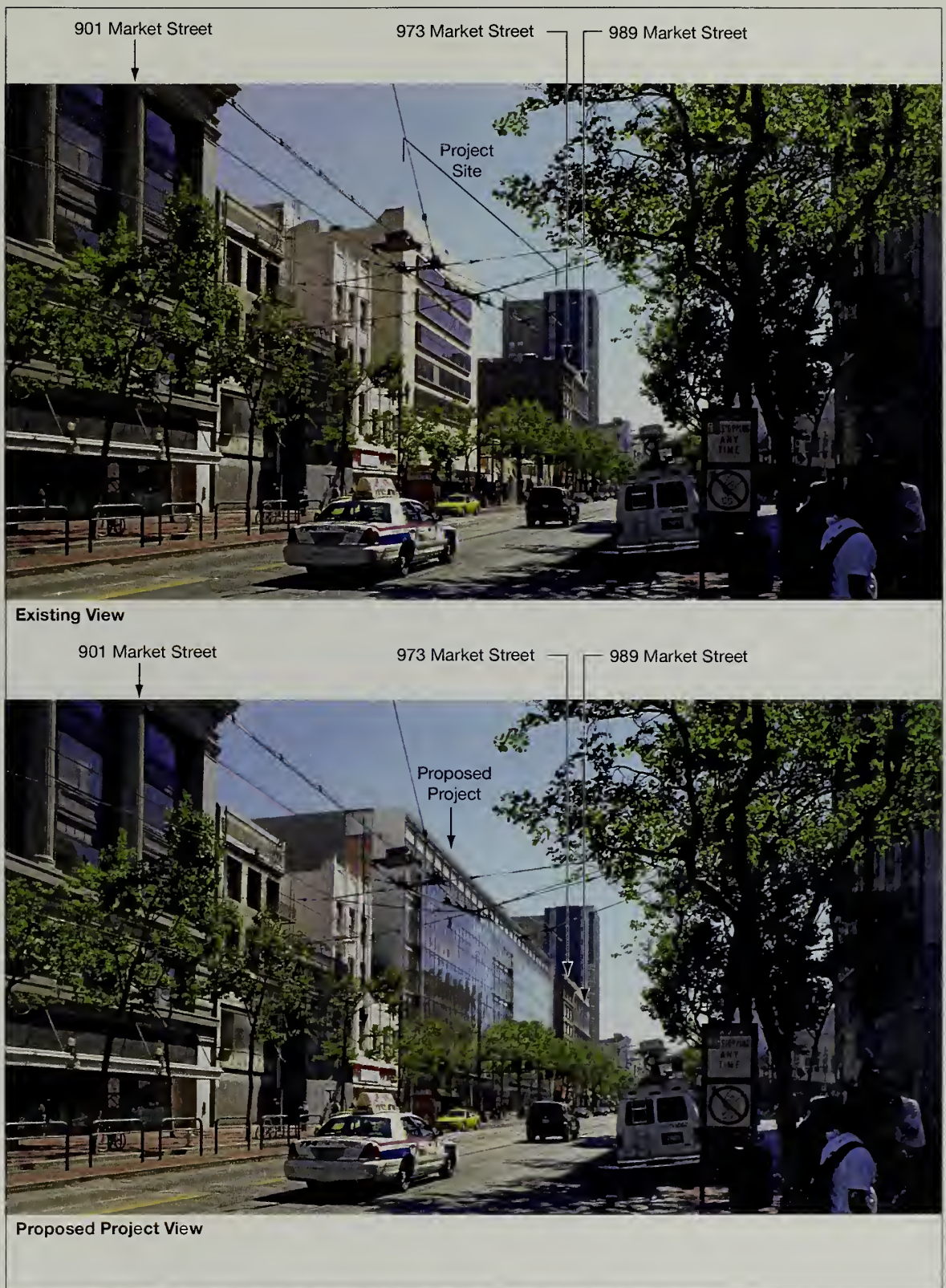
FIGURE IV.B.2: VIEWPOINT LOCATIONS



SOURCE: Square One Productions; Turnstone Consulting

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FIGURE IV.B.3: VIEW LOOKING NORTHEAST ALONG MARKET STREET
(VIEWPOINT A) EXISTING AND PROPOSED VIEWS



SOURCE: Square One Productions; Turnstone Consulting

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FIGURE IV.B.4: VIEW LOOKING SOUTHWEST ALONG MARKET STREET
(VIEWPOINT B) EXISTING AND PROPOSED VIEWS



SOURCE: Square One Productions; Turnstone Consulting

2005.1074E

FIGURE IV.B.5A: VIEW LOOKING NORTHEAST ALONG STEVENSON STREET
(VIEWPOINT C) (EXISTING)



SOURCE: Square One Productions; Turnstone Consulting

CITYPLACE
2005.1074E

FIGURE IV.B.5B: VIEW LOOKING NORTHEAST ALONG STEVENSON STREET
(VIEWPOINT C) (PROPOSED)

IMPACTS ON VISUAL QUALITY

Project impacts on the visual quality of the site and its surroundings with respect to building height and massing, architectural features, and public view corridors along Market and Stevenson Streets are discussed below.

Height and Massing

At approximately 90 feet, the proposed building height would be similar to the existing on-site five-story, 94-foot-high building at 935-939 Market Street, but would be 45 feet and 60 feet (up to three stories) taller than the other two existing on-site buildings at 941-945 Market and 947-965 Market, respectively.

The proposed building would also be about 60 feet taller than the two existing 30-foot-tall, two-story buildings currently occupied by Sheikh Shoes and Pearl Art and Craft Supplies that are located immediately east and west of the project site, respectively. The proposed building height and scale would be similar to or smaller than the five- to 16-story buildings in the project area, including the seven- to eight-story buildings across Market Street to the northeast; the eight-story Westfield-San Francisco Centre shopping mall and the 5-story retail building (partially occupied by Marshalls) to the east; and the 16-story building (One Sixth Street) to the west of the project site. The proposed building would be one to four stories taller than other buildings across Market Street to the north, including the one-story retail building at 934 Market Street, the four-story Bristol Hotel building, and the three-story office building at 34 Mason Street, all located on the block bounded by Mason, Eddy, Cyril Magnin, and Market Streets; as well as the two-story Dean Building (950-964 Market Street), the three vacant two- to three-story commercial buildings (966-976 Market Street), and the Crazy Horse Gentleman's Club at 980 Market Street, all located on the triangular block bounded by Turk, Taylor, and Market Streets.

The rectilinear massing and profile of the proposed building would be consistent with the existing pattern of buildings along Market Street in the vicinity of the project site, and likewise at the rear of the buildings along Stevenson Street. (See Figures IV.B.3, IV.B.4, and IV.B.5B (Proposed Project) on pp. IV.B.7, IV.B.8, and IV.B.10, respectively.) The proposed building would fill a mid-block gap in the street wall at the upper stories, between a building of comparable height east of the project site (the five-story 901 Market Street building) and buildings of similar height to the west of the project site (the seven-story 973 Market Street building and the six-story 989 Market Street building). The proposed project would reinforce rather than diminish the visual coherence of the site and its surroundings with respect to height and massing.

Architectural Features

In contrast to many of the surrounding buildings that are built in historically-derived revival styles popular during the early twentieth century, the proposed project would be clearly contemporary in architectural expression and materials. The proposed project includes features that are intended to relate to the scale and character of surrounding development, but the design does not overtly mimic historic references.

The rectilinear profile of the building's Market Street façade would be outlined and reinforced by a frame-like element that would contain the side and top edges of the glass curtain wall façade. The curtain wall façade would be recessed behind this frame by approximately 24 inches to contribute depth to the façade. The side edges of the frame would also resolve the corner transition between the glazed curtain wall system along Market Street and the windowless walls along the side lot lines of the proposed building. The top edge of the frame would create a shadow line along the top of the building, functioning visually as a horizontal projecting cornice-like element. This strongly expressed horizontal feature reinforces the linear continuity with the cornice lines of nearby buildings of comparable height. (See Figures IV.B.3 and IV.B.4 (Proposed Project) on p. IV.B.7 and IV.B.8, respectively.)

Analogous to older development along Market Street, the façade plane of the proposed building would be organized into a hierarchy of vertical and horizontal elements, in a more pared-down fashion. Transparent horizontal bands of glazing would alternate with the opaque horizontal edges of the floorplates. The mullion grid would divide large horizontal planes of glass into smaller-scaled, vertically oriented pieces. The mullion grid would stand out from the plane of glass to contribute depth and texture to the façade. Two transparent screen-like panels would appear to float in front of the glass curtain wall, contributing layers and depth to the façade. The panels also function to relieve the wide breadth of the façade by articulating narrower segments of the façade.

Like retail ground floors of nearby older development patterns, the retail ground floor of the proposed project would be transparent and oriented to pedestrians. The upper floors of the proposed project would also be transparent to engage pedestrians, particularly at nighttime, revealing the activities and circulation within, from behind the screen-like panels on the façade.

The side lot line walls and rear façades of the proposed building would be sheathed in metal panels. They would be simple and unarticulated in keeping with the simple, utilitarian character of the other rear façades along Stevenson Street.

Looking Northeast along Market Street (Viewpoint A)

In this view (see Figure IV.B.3 on p. IV.B.7), the buildings at 973 Market Street and 989 Market Street appear in the foreground. The project site, which is partially obscured by existing street trees, is visible just beyond the building at 973 Market Street. There is a noticeable gap in the street wall where the two shorter buildings on the project site (935-939 Market Street and 941-945 Market Street) are located. In the background, the tops of the Marriott Hotel at Fourth and Mission Streets and the Four Seasons Hotel at 757 Market Street are visible above shorter buildings. The proposed project would fill in the existing visual gap in the street wall. Although the Marriott Hotel would no longer be visible from this vantage point, the Four Seasons and other buildings further east along Market Street would still be visible in the background.

Looking Southwest along Market Street (Viewpoint B)

In this view (see Figure IV.B.4 on p. IV.B.8), the buildings at 901, 923, 925, and 929-931 Market Street occupy the foreground. The project site is visible just beyond these four buildings, and there is a noticeable gap in the street wall where the two shorter buildings on the project site (935-939 Market Street and 941-945 Market Street) are located. The buildings at 973, 989, and 995 Market Street are visible beyond the project site, and other buildings further west along Market Street are visible in the background. With the proposed project in place, the existing visual gap in the street wall would be filled. The east wall of 973 Market Street would be obscured from view, and the east wall of 995 Market Street would be partially obscured from view. Other buildings further west along Market Street would still be visible in the background.

Looking Northeast along Stevenson Street (Viewpoint C)

This view (see Figures IV.B.5A and IV.B.5B on pp. IV.B.9-IV.B.10) shows the rear façades of the buildings on the subject block. The buildings at 973 Market Street and 989 Market Street occupy the foreground, and the project site is visible just beyond these two buildings. The building at 901 Market Street and the Westfield-San Francisco Centre are visible in the background. Although the proposed project would introduce a rectilinear building mass that is taller than what currently exists on the project site, it would not obscure views of 901 Market Street or the Westfield-San Francisco Centre.

Conclusion

Although the proposed new building would be a prominent new presence along Market Street, the visual changes under the proposed project would not be considered to substantially degrade the existing visual character or quality of the site and its surroundings in the developed urban context of the proposed project. The proposed new building would be placed within a pre-existing, visually varied, and densely developed urban context, and it would be compatible with the scale

and character of existing buildings in the vicinity of the project site. For these reasons, the proposed project would not have a significant environmental impact on visual quality under CEQA.

C. TRANSPORTATION AND CIRCULATION

This section summarizes and incorporates the results of a transportation impact analysis (TIA) prepared by an independent transportation consultant for the proposed retail development at 935-965 Market Street.¹ The TIA describes existing and future (2030) transportation conditions (roadway traffic, transit, pedestrian, bicycle, parking, and loading) in the vicinity of the proposed project and evaluates its environmental effects.

SETTING

Transportation Study Area

The TIA established a study area around the project site for traffic, transit, and parking analyses (see Figure IV.C.1: Transportation Study Area and Intersection Analysis Locations). For the traffic analysis, ten study intersections were identified as locations likely to be most affected by the proposed project: Fourth Street/Market Street, Fourth Street/Mission Street, Fifth Street/Market Street, Fifth Street/Stevenson Street, Fifth Street/Mission Street, Fifth Street/Howard Street, Sixth Street/Market Street, Sixth Street/Stevenson Street, and Sixth Street/Mission Street. The transit study area includes local and regional transit service within two blocks (approximately one-quarter mile) of the project site. The boundaries of the parking study area are Ellis Street to the north, Howard Street to the south, Fourth Street to the east, and Seventh Street and Leavenworth Street to the west.

Roadway Network

Regional Freeways

The project site is served by Interstate 80 (I-80), U.S. Highway 101 (U.S. 101), and Interstate 280 (I-280). Regional access to and from the project site and the East Bay is provided by I-80 and the San Francisco-Oakland Bay Bridge. The closest access points to I-80 are the Fifth Street/Bryant Street on-ramp, the Fifth Street/Harrison Street off-ramp, and the Eighth Street/Harrison Street off-ramp. U.S. 101 and I-280 provide regional access to and from the Peninsula and the South Bay and have an interchange south of downtown San Francisco. The closest access to southbound U.S. 101 is from the I-80 on-ramps at Fourth Street/Harrison Street and Seventh Street/Harrison Street. U.S. 101 connects with I-80 southwest of the project site and has off-ramps at Seventh Street/Bryant Street and Fourth Street/Bryant Street. I-280 has nearby on- and

¹ The information in this section is from the *935-965 Market Street Transportation Study – Final Report*, October 28, 2009, prepared by AECOM (hereafter *Transportation Study*). This report is on file and available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, in Case File Number 2005.1074E.



FIGURE IV.C.1: TRANSPORTATION STUDY AREA
AND INTERSECTION ANALYSIS LOCATIONS

off-ramps at Sixth Street/Brannan Street and Fifth Street/King Street. Regional access to the North Bay is provided by U.S. 101, which extends north via Van Ness Avenue and Lombard Street to the Golden Gate Bridge. Van Ness Avenue serves as U.S. 101 between Market Street and Lombard Street.

Local Streets

The north-south roadways serving the project site are Fourth, Fifth, and Sixth Streets, and the east-west roadways are Market, Mission, Howard, Stevenson, and Jessie Streets.²

Fourth Street is a one-way, southbound-only arterial running from Market Street to Third Street. It forms a one-way couplet with Third Street and runs through the South of Market (SoMa) and Mission Bay neighborhoods. Near the project site, Fourth Street has four travel lanes, with the rightmost lane designated at all times as a bus- and taxi-only lane from Market Street to mid-block between Howard and Folsom Streets. Between Market and Mission Streets, on-street parking is provided on both sides of the street. Between Mission and Howard Streets, parking is not provided on either side of the street. The General Plan classifies Fourth Street as a Major Arterial in the Congestion Management Program (CMP) Network and as part of the Metropolitan Transportation System (MTS) Network.^{3,4} It is also classified as a Transit-Important Primary Transit Street, a Citywide Pedestrian Network Street between Market and Folsom Streets, and a Neighborhood Commercial Street.

Fifth Street, along the project block's eastern boundary, is a two-way, north-south arterial running from Market Street to Townsend Street (north of Market Street, Fifth Street becomes Cyril Magnin Street) with two travel lanes in each direction. At the Fifth Street and Mission Street intersection vehicles (except for buses and taxis) are restricted from making the northbound left turn movement. In the southbound direction the left-turn movement restriction applies to all vehicles except buses. Between Market and Mission Streets, on-street parking is provided on both sides of the street. Between Mission and Howard Streets, parking is provided on the west side of the street. The *General Plan* classifies Fifth Street as a Major Arterial in the CMP

² In the South of Market area streets that run in the northwest/southeast direction are considered to be north-south streets and streets that run in the southwest/northeast direction are considered to be east-west streets.

³ The Congestion Management Program Network is a network of freeways, state highways, and major arterials established in accordance with state Congestion Management legislation. Transit Conflict Streets are also included in this network.

⁴ The Metropolitan Transportation System Streets, Highways, and Freight Network is a regional network for San Francisco of freeways, major and secondary arterials, transit conflict and recreational streets meeting nine criteria developed by the Metropolitan Transportation Commission as part of the Regional Transportation Plan.

Network and as part of the MTS Network. It is also classified as a Neighborhood Commercial Street between Market and Mission Streets and a Citywide Bicycle Route (Route 19).

Sixth Street, along the project block's western boundary, is a two-way, north-south arterial running from Market Street to Brannan Street where it connects with on- and off-ramps to I-280. Sixth Street has two travel lanes in each direction with northbound traffic headed to Taylor Street and southbound traffic coming from Golden Gate Avenue. Between Market and Howard Streets, on-street parking is provided on both sides of the street. However, during the weekday PM peak period, on-street parking is prohibited on the east side of the street between Market and Howard Streets. The *General Plan* classifies Sixth Street as a Major Arterial in the CMP Network and as part of the MTS Network. It is also classified as a Neighborhood Commercial Street between Market Street and Howard Street.

Market Street is a major two-way arterial that runs between Steuart Street to the east and Portola Drive to the west. It serves as the dividing line between the two major street grids in Downtown San Francisco. It is well-served by local and regional transit, carrying many of San Francisco Municipal Railway's (MUNI's) surface routes as well as Bay Area Rapid Transit (BART) and MUNI subway routes. In the vicinity of the project site, Market Street has two lanes in each direction with the middle lane reserved for transit vehicles and taxis at all times, no on-street parking, and two curbside loading bays reserved for delivery vehicles that serve properties fronting on Market Street. Left-hand turns are prohibited along the full length of Market Street in the Downtown area. The *General Plan* classifies Market Street as a Transit Conflict Street between Franklin and Steuart Streets in the CMP Network. It is also classified as a Transit-Oriented Street between Gough and Steuart Streets, a Citywide Pedestrian Network Street between Castro and Steuart Streets, a Neighborhood Commercial Street between Castro and Steuart Streets, and a Citywide Bicycle Route (Route 50).

Mission Street is a four-lane roadway that runs in an east-west direction between The Embarcadero and Van Ness Avenue, and continues in a north-south direction west of Van Ness Avenue. One block south of the project site, Mission Street runs parallel to Market Street, with two lanes of traffic in each direction. The rightmost lanes in both directions are designated bus-only lanes between 7:00 AM and 6:00 PM in the eastbound direction and between 4:00 PM and 6:00 PM in the westbound direction. Left turns are prohibited along Mission Street for most of its length in the Downtown area (however, taxis and buses are permitted to make left-turns on certain streets). On-street parking is provided on both sides of the street between Fifth and Seventh Streets, but is prohibited during the weekday PM peak period. The *General Plan* classifies Mission Street as Transit Conflict Street in the CMP network. It is also classified as a Transit-Oriented Primary Transit Street and a Citywide Pedestrian Network Street between The Embarcadero and Cesar Chavez.

Howard Street is a major east-west roadway in downtown San Francisco stretching from The Embarcadero through SoMa to South Van Ness Avenue. It operates one-way westbound for most of its length, with four lanes in the vicinity of the project. On-street parking is provided on both sides of Howard Street between Fifth and Seventh Streets. The *General Plan* classifies Howard Street as a Major Arterial in the CMP network and as part of the MTS network. It is also classified as a Neighborhood Commercial Street and a Citywide Bicycle Route (Route 30) between Eleventh Street and The Embarcadero.

Stevenson Street is an east-west alleyway located between Market Street and Mission Street. It is a discontinuous street extending intermittently between Gough Street and First Street. In the vicinity of the project site, Stevenson Street extends continuously from near Eighth to Fifth Street; it is a one-lane, one-way eastbound roadway between Sixth and Fifth Streets. Parking is provided on the south side of the street. The curb-to-curb width of Stevenson Street is 21 feet between Sixth Street and the project site. About 400 feet east of Sixth Street, there is a “jog” in Stevenson Street that reduces the curb-to-curb-width to about 17 feet. East of the “jog,” the curb-to-curb width increases to 21 feet. At the intersection with Fifth Street, parking is prohibited on both sides of the street and the left- and right-turn movements are given separate lanes. Fifth Street is marked with a “KEEP CLEAR” zone in both directions to allow vehicles from Stevenson Street to make turning movements when traffic is stopped. The sidewalks on Stevenson Street are about 7 feet wide adjacent to the project site.

Jessie Street is an east-west alleyway located between Market Street and Mission Street and south of Stevenson Street. In the vicinity of the project site, Jessie Street is a one-lane, one-way eastbound roadway from Sixth Street to Mint Street near Fifth Street. In November 2007, a portion of the alley used to connect to Fifth Street around the Mint Building was converted to a pedestrian plaza. Vehicular traffic is prohibited at all times in the plaza.

Intersection Operating Conditions

Methodology

The operations of roadway facilities are described with the term “Level of Service” (LOS). LOS is a qualitative description of traffic flow based on factors such as speed, travel time, delay, and freedom to maneuver. LOS ranges from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. Typically, LOS E and LOS F represent unacceptable Levels of Service. In San Francisco, LOS A through D are considered excellent to satisfactory service levels, and LOS E and F represent unacceptable service levels. (See Appendix B for LOS definitions for signalized and unsignalized intersections.)

Existing Conditions

Table IV.C.1 presents the results of the intersection LOS analysis for the existing weekday PM peak hour conditions. The ten study intersections were evaluated using the 2000 *Highway Capacity Manual (HCM)* methodology.⁵ Existing intersection operating conditions were evaluated for the peak hour (generally 5:00 PM to 6:00 PM) of the weekday PM peak period (4:00 PM to 6:00 PM). Intersection turning movement counts were conducted at all study intersections on Wednesday, September 19, 2007.

Table IV.C.1: Intersection LOS – Existing Conditions^a

Intersection	Traffic Control	Existing Conditions	
		LOS	Delay
1. Fourth Street/Market Street <i>With Transit Lane Enforcement</i>	Signalized	F <i>F</i>	> 80.0 > 80.0
2. Fourth Street/Mission Street <i>With Transit Lane Enforcement</i>	Signalized	C <i>D</i>	28.7 39.1
3. Fifth Street/Market Street <i>With Transit Lane Enforcement</i>	Signalized	C <i>C</i>	27.0 28.2
4. Fifth Street/Stevenson Street	One-Way Stop-Controlled	D	27.6
5. Fifth Street/Mission Street ^b <i>With Transit Lane Enforcement</i>	Signalized	C <i>C</i>	29.5 31.8
6. Fifth Street/Howard Street	Signalized	C	22.3
7. Sixth Street/Market Street <i>With Transit Lane Enforcement</i>	Signalized	C <i>C</i>	29.1 31.0
8. Sixth Street/Stevenson Street	One-Way Stop-Controlled	C	21.9
9. Sixth Street/Mission Street <i>With Transit Lane Enforcement</i>	Signalized	D <i>D</i>	36.7 40.8
10. Fourth Street/Howard Street	Signalized	D	38.8

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

^a During field observations, queues formed at each of the study intersections and the Market and Mission Street transit-only lanes were used primarily by transit vehicles with occasional encroachment by other vehicles.

^b The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At the time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the San Francisco Bicycle Plan EIR.

Source: AECOM – October 2009

⁵ As part of the HCM methodology, adjustments are typically made to the capacity of each intersection to account for various factors that reduce the ability of the streets to accommodate vehicles (such as the downtown nature of the area, number of pedestrians, vehicle types, lane widths, grades, on-street parking and queues). These adjustments are performed to ensure that the LOS analysis results reflect the operating conditions that are observed in the field.

It should be noted that there are transit-only lanes on Market Street and Mission Street. Observations of existing conditions found that the transit-only lanes on Market Street were used primarily by transit vehicles but some non-transit vehicles used these lanes. The transit-only lanes on Mission Street operated similarly but more non-transit vehicles were observed in the transit-only lane. Based on these observations and discussions with City staff and other consultants, a consistent set of adjustment factors was applied to the Market Street and Mission Street intersections, as shown in the transportation impact analysis conducted for this project.⁶ To account for the fact that these transit-only lanes were not fully enforced, a second set of intersection analyses was conducted that assessed conditions if all non-transit vehicles were within their correct lane (the “with transit lane enforcement” scenario).

Many of the intersections have one or more approaches that operate at unacceptable LOS (E or F), but the average delay results in an overall acceptable LOS (D or better). For example, the northbound approach of the Fifth Street/Market Street intersection typically operates at LOS E, but the average delay of the intersection is LOS D due to minor delays at the other approaches. Currently, all study intersections operate with acceptable conditions (LOS D or better) during the weekday PM peak hour with the exception of the Fourth Street/Market Street intersection. This intersection operates at LOS F (delay greater than 80 seconds) due to the substantial delay on the southbound and eastbound approaches. Under the transit enforcement scenario, the study intersections along Market Street and Mission Street would operate at somewhat worse levels, but no additional intersections would operate at LOS E or LOS F.

Transit

The project site is well-served by transit, with both local and regional service provided near the project site (see Figure IV.C.2: Nearby Transit Service). Local service is provided by MUNI bus, light rail, streetcar, and cable car lines. MUNI operates 31 transit lines in the vicinity of the project site. Service to and from the East Bay is provided by BART, Alameda-Contra Costa Transit District (AC Transit), the Alameda-Oakland Ferry, and the Alameda Harbor Bay Ferry; service to and from the North Bay is provided by Golden Gate Transit buses and ferries; service to and from the peninsula and the South Bay is provided by Caltrain, San Mateo County Transit District (SamTrans), and BART.

Local Transit Service

In May 2006, MUNI initiated a comprehensive review of its operations with the aim of increasing the effectiveness of the City’s public transit system and transforming it into a more efficient public transit system. The Transit Effectiveness Project (TEP) includes proposals for service and

⁶ See *Transportation Study*, Appendix D: Intersection Level of Service Calculations.



street network changes that address issues related to reliability, travel times, and service areas. In August 2008, the San Francisco Municipal Transportation Agency (SFMTA) presented a refined set of proposals known as *Staff Recommendations*. These recommendations were based on feedback provided by SFMTA employees and members of the public, including elected officials, other City agencies, and community groups, over the spring and summer of 2008. The TEP proposals were endorsed by the SFMTA Board of Directors in October 2008, and could be implemented upon completion of the required environmental assessment.

Table IV.C.2 summarizes the weekday PM peak hour MUNI transit service in the vicinity of the project site. At the end of the description of the existing transit service by corridor a list of TEP-recommended change for the routes or lines is provided.

Northeast Routes

The **9X/9AX/9BX-Bayshore Expresses** operate on Third and Fourth Streets in the vicinity of the project site and provide service between northeast and southeast San Francisco via downtown. To shorten wait times and reduce crowding, the TEP recommends more frequent service on this route.

The **30-Stockton** and **45-Union/Stockton** operate on Third and Fourth Streets in the vicinity of the project site and provide service to Mission Bay, Downtown, Chinatown, North Beach, the Marina District and Pacific Heights. The 45-Union/Stockton provides additional service to northwest San Francisco at its outer terminal adjacent to The Presidio. To reduce crowding and improve reliability, the TEP recommends that all daytime service on Stockton Street be provided by articulated buses.

Northwest Routes

The **5-Fulton**, **21-Hayes**, **31-Balboa**, **38-Geary**, and **38L-Geary Limited** provide service between downtown (the Ferry Building or Transbay Terminal) and the Richmond District. The TEP recommends increased service frequency in the peak load direction during the AM and PM peak periods for the 5-Fulton, the 21-Hayes, and the 38L-Geary Limited. The TEP also recommends limited stop service operation of the 5-Fulton route.

Southwest Routes

The F-Market & Wharves historic streetcar service operates on Market Street and The Embarcadero, and provides daily service between the Castro area, downtown, and Fisherman's Wharf. The TEP recommends increased service frequency in the peak load direction during the PM peak period.

Table IV.C.2: Nearby San Francisco Municipal Railway Service

Route	Service Frequency (min.)			Nearest Stop Location (inbound, outbound)
	AM	Midday	PM	
F-Market & Wharves	6	8	7	Fifth/Market, Sixth/Market
J-Church	9	10	9	Powell Station
K-Ingleside	9	10	9	Powell Station
L-Taraval	7	10	7	Powell Station
M-Ocean View	9	10	9	Powell Station
N-Judah	7	10	7	Powell Station
S-Castro Shuttle	8	--	10	Powell Station
T-Third Street	9	10	10	Powell Station
5-Fulton	6	8	5	Mason/Market
6-Parnassus	10	12	10	Mason/Market, Sixth/Market
7-Haight	15	-	15	Fifth/Market, Sixth/Market
9-San Bruno	10	10	8	Fifth/Market, Sixth/Market
9X-Bayshore Express	10	10	10	Third/Market, Fourth/Market
9AX-Bayshore A Express	10	--	10	Third/Market, Fourth/Market
9BX-Bayshore B Express	10	--	10	Third/Market, Fourth/Market
14-Mission	6	8	6	Fifth/Mission
14L-Mission Limited	-	20	-	Fifth/Mission
14X-Mission Express	10	-	10	Fifth/Mission
16AX-Noriega A Express	9	--	12	Mason/Market, Fifth/Market
16BX-Noriega B Express	10	--	12	Mason/Market, Fifth/Market
21-Hayes	7	12	7	Fifth/Market, Mason/Market
26-Valencia	20	20	20	Fifth/Mission
27-Bryant	12	12	12	Fifth/Market
30-Stockton	5	5	5	Third/Market, Fourth/Market
31-Balboa	10	15	10	Fifth/Market, Powell/Market
38-Geary	8	8	6	Powell/O'Farrell, Powell/Geary
38L-Geary Limited	7	7	7	Powell/O'Farrell, Powell/Geary
45-Union/Stockton	9	9	9	Third/Market, Fourth/Market
71-Haight/Noriega	10	12	10	Fifth/Market, Sixth/Market
71L-Haight/Noriega Ltd.	10	-	10	Fifth/Market, Sixth/Market
Powell-Hyde Cable Car	10	8	8	Powell/Market
Powell-Mason Cable Car	10	8	8	Powell/Market

Source: San Francisco Municipal Railway; AECOM, October 2009

The **K-Ingleside**, **L-Taraval**, **M-Ocean View**, **N-Judah**, and **S-Castro Shuttle** lines operate in the Market Street subway; the closest station is at Powell Street. The K-Ingleside line provides service between the Embarcadero Station and the Balboa Park Station; the L-Taraval line provides service between the Embarcadero Station and the San Francisco Zoo (Wawona Street/46th Avenue); the M-Ocean View line provides service between the Embarcadero Station and the Balboa Park Station; the N-Judah line provides service between the Caltrain Station (Fourth Street/King Street) and Ocean Beach; and the S-Castro Shuttle provides shuttle service between the Embarcadero Station and the Castro Station. The TEP recommends increased service frequency in the peak load direction during the AM and PM peak periods for the L-Taraval and the N-Judah lines. The TEP also recommends a reduction in the service frequency for the M-Ocean View and the replacement of the S-Castro Shuttle service with the K-Ingleside and L-Taraval lines.

The **6-Parnassus**, **7-Haight**, **16AX/16BX-Noriega Expresses**, and **71/71L-Haight/Noriega** operate on Market Street in the vicinity of the project site and provide service between downtown and Haight-Ashbury and the Sunset District. The TEP recommends that the 7-Haight route be replaced by the 6-Parnassus and the 71/71L-Haight/Noriega Local/Limited routes. In addition, a reduction in service frequency for the AM peak period and increase in service frequency in the PM peak period for the 16AX-Noriega Express is recommended.

Southeast Routes

The **9-San Bruno** and **9X/9AX/9BX-Bayshore Expresses** provide service between downtown and the southeastern neighborhoods of San Francisco. The 9-San Bruno operates on Market Street in the vicinity of the project site and provides service between the Ferry Terminal and Visitacion Valley. The 9X/9AX/9BX-Bayshore Expresses operate on Third and Fourth Streets in the vicinity of the project site and provide service between northeast San Francisco and Portola, Visitacion Valley, the Balboa Park Station, and City College. The TEP recommends more frequent service for the express lines to shorten wait times and reduce crowding.

The **14-Mission**, **14L-Mission Limited**, **14X-Mission Express**, **26-Valencia**, and **27-Bryant** provide service between downtown and the Inner and Outer Mission. The 14-Mission operates on Mission Street in the vicinity of the project site and provides service between the Ferry Terminal and Daly City. In addition to the local serving routes, limited and express service is provided on the 14L and 14X lines. The 26-Valencia provides service between downtown and the Balboa Park Station. The 27-Bryant provides service between Nob Hill and the Mission. The TEP recommends increased service frequency in the peak load direction during the AM and PM peak periods for the Mission Corridor bus routes including additional peak period service with longer service times for the 14-L route and increased service frequency for the 14-X route. Under

the TEP recommendations, the 26-Valencia route is proposed to be eliminated and the 27-Bryant will increase service frequency in the peak load direction during the AM and PM peak periods.

The **J-Church** and **T-Third Street** lines operate in the Market Street subway, with a station at Powell Street. The J-Church line provides service between the Embarcadero Station and the Balboa Park Station. The T-Third Street line provides service between the Castro Street Station and the Sunnydale Station (Bayshore Boulevard/Sunnydale Avenue). Inbound T-Third Street trains become outbound K-Ingleside trains at the Embarcadero Station. Inbound K-Ingleside trains become outbound T-Third Street trains at the West Portal Station. The TEP recommends increased service frequency in the peak load direction during the AM and PM peak periods for the J-Church line.

Regional Transit Service

East Bay

BART operates regional rail transit service between the East Bay (from Pittsburg/Bay Point, Richmond, Dublin/Pleasanton and Fremont) and San Francisco, and between San Mateo County (Millbrae and San Francisco International Airport) and San Francisco. The nearest BART station to the project site is the Powell Street Station, which has an entrance on the southwest corner of Fifth Street/Market Street. In the weekday PM peak hour, the peak hour combined frequencies at Powell Street Station are approximately every 2-4 minutes towards the East Bay and every 4 minutes towards Daly City and points south.

AC Transit is the primary bus operator for the East Bay, including Alameda and western Contra Costa Counties. AC Transit operates 27 routes between the East Bay and San Francisco's Transbay Terminal, located at First Street/Mission Street, most of which are commute express services operating during the peak hour in the peak direction.

South Bay

Transit service to and from the South Bay is provided by BART, SamTrans and Caltrain. SamTrans provides bus service between San Mateo County and San Francisco. In the weekday PM peak hour, there are six commute-only expresses operating between downtown San Francisco and points in San Mateo County, in addition to two local/limited lines and one express line which operate in both directions. The closest SamTrans stop, at Fifth Street/Mission Street, serves all but one of these SamTrans lines.

Caltrain provides commuter rail passenger service between Santa Clara, San Mateo, and San Francisco Counties. The closest station to the project site is the main San Francisco terminal at Fourth Street/Townsend Street, which connects to the project site via MUNI lines 30-Stockton,

45-Union/Stockton, N-Judah, and T-Third. In the weekday PM peak period, there are ten trains leaving the station and six trains arriving at the station, most of which are limited-stop or Baby Bullet express services.

North Bay

Transit service to and from the North Bay is provided by Golden Gate Transit buses and ferries. In the weekday PM peak hour, Golden Gate Transit operates 17 commute-only expresses, 3 all-day bus routes which operate in both directions, and ferry services between San Francisco and Larkspur and Sausalito. In the weekday PM peak hour, bus service is primarily out of San Francisco, running along Mission Street and Seventh Street, through the Civic Center area, and to Van Ness Avenue and Geary Boulevard on its way to the Golden Gate Bridge. Additional bus service operates in the Financial District (Sansome Street) and along North Point Street and Lombard Street to reach the bridge. Ferries operate out of the Ferry Building located at The Embarcadero and Market Street, which can be reached by the Market Street subway and surface lines from the project site. No late night service is provided. The Golden Gate bus stop nearest to the project site is located just north of Seventh Street at Market Street, one and one-half blocks from the project site.

Local and Regional Transit Screenline Analysis⁷

Four screenlines have been established in San Francisco to analyze potential impacts of projects on MUNI service: Northeast, Northwest, Southwest, and Southeast, with sub-corridors within each screenline. Three regional screenlines have been established around San Francisco to analyze potential impacts on the regional transit agencies: East Bay (BART, AC Transit, ferries), North Bay (Golden Gate Transit buses and ferries); and the South Bay (BART, Caltrain, SamTrans). (See Appendix B, Figures F-1 and F-2 from the *Transportation Study*). The screenline analysis focuses on transit trips in the outbound direction, i.e., trips from greater downtown San Francisco to other parts of the City and the region.

Capacity utilization relates the number of passengers per transit vehicle to the design capacity of the vehicle and is used to determine the amount of available space within each screenline. MUNI has adopted a capacity utilization service standard of 85 percent, based on the maximum load. This standard includes seating capacity plus a substantial number of standees, with standees representing somewhere between 30 to 80 percent of seated passengers, depending upon the specific transit vehicle configuration. All of the regional transit agencies except BART have a

⁷ The concept of screenlines is used to describe the magnitude of travel to or from the greater downtown area, and to compare estimated transit volumes to available capacities. Screenlines are hypothetical lines that would be crossed by persons traveling between downtown and its vicinity and other parts of San Francisco and the region.

one-hour load factor standard of 100 percent, which indicates that all seats are full. BART has a one-hour load factor standard of 135 percent, which indicates that all seats are full and an additional 35 percent of the seating capacity is standees, i.e., 1.35 passengers per seat.

All MUNI screenlines and sub-corridors are currently operating below the capacity utilization service standard and can accommodate additional passengers. All regional transit providers operate at less than their one-hour load factor standards, indicating that seats are generally available.

Pedestrians

Methodology

Similar to roadway facilities, sidewalk operations are described with the term "Level of Service" (LOS). Pedestrian LOS was calculated using standard HCM methodology, which includes variables such as the flow rate of pedestrians and effective walkway width. Pedestrian counts were conducted on a Wednesday in September 2007 at the midday and PM peak periods.

Sidewalk Conditions

Sidewalks are provided along all streets in the study area. Along the Market Street frontage of the proposed project, the sidewalk is approximately 30 feet wide. Crosswalks and pedestrian signals are provided at all nearby intersections. Heavy pedestrian volumes are typical on Market Street during both the weekday midday (1:00 to 3:00 PM) and the PM peak (4:00 to 6:00 PM) periods. During both time periods, the nearby sidewalks and crosswalks operated at free-flow conditions with pedestrians moving at normal walking speeds with freedom to bypass other pedestrians. In the vicinity of the project site pedestrian congestion and crowding occurs near bus/street car island stops and BART/MUNI underground entrances during the weekday peak periods, as well as weekend and holiday peak periods. The Fifth Street/Market Street intersection sidewalks include two BART/MUNI underground entrances and five bus and/or streetcar island stops. There are low pedestrian volumes on Stevenson Street, along the rear of the project site, because few businesses front on Stevenson Street, there are a limited number of on-street parking spaces, and existing loading activities make pedestrian use less attractive than Market or Mission Streets.

Along Fifth and Sixth Streets the sidewalks are approximately 10 feet wide on the project block and exhibit moderate pedestrian volumes. Sidewalks on Fifth and Sixth Streets operate at free-flow conditions with pedestrians moving at normal walking speeds with freedom to bypass other pedestrians. During peak periods, including weekends and holidays, pedestrian congestion and crowding at the sidewalks near the Fifth Street/Market Street and Fifth Street/Mission Street intersections is typical. The increased level of pedestrian activity on the sidewalks at the Fifth

Street/Market Street intersection is associated in part with the number of transit patrons using the BART/MUNI underground entrances and bus/streetcar island stops. The pedestrian activity level at the sidewalks near the Fifth Street/Mission Street intersection is partly associated with the patrons of the Fifth/Mission parking garage, as well as conventioners attending events at Moscone Center, San Francisco residents and visitors patronizing the area's cultural institutions, retail/restaurant/hotel/entertainment businesses, employees of nearby companies in SOMA, and transit riders catching the different bus lines that serve the Mission Street corridor. North of the project site, near Union Square and the Union Square and Ellis/O'Farrell parking garages, heavy pedestrian volumes and minor overcrowding at street corners during peak shopping periods is typical.

The 30-foot-wide sidewalk along the proposed project frontage (Market Street) operates at free-flow conditions during the weekday midday and PM peak periods. In order to quantitatively evaluate existing conditions, the pedestrian LOS was calculated at the narrowest portion of the sidewalk along the project frontage (on the south sidewalk just east of the Turk Street crosswalk near a truck loading turnout). The effective walkway width at this location was calculated to be 13 feet when considering the location of obstructions such as trees, bicycle racks, and newspaper stands. Pedestrian counts were conducted during the weekday midday and PM peak hours. The sidewalk currently operates at LOS B.

Crosswalk Conditions

There are two mid-block crosswalks on Market Street between Fifth and Sixth Streets that provide pedestrian access from Turk Street and Mason Street. These crosswalks were observed to operate well with all pedestrians provided enough space to walk within the crosswalk striping. Field observations found a potential for pedestrian-vehicle conflicts at these crosswalks due to right turns from Turk Street to Market Street.

The crosswalks at the Market Street/Fifth Street intersection were observed to operate at free-flow conditions in the weekday PM peak hour. Counts of existing pedestrians at the Fifth Street/Market Street intersection found that approximately 1,400 pedestrians travel in the north-south direction across Market Street and approximately 2,600 pedestrians travel in the east-west direction across Fifth Street during the weekday PM peak hour. The heaviest pedestrian traffic occurs in the east and south crosswalks, but there is sufficient sidewalk space at all corners to accommodate pedestrians waiting at the curb.

Bicycles

In the vicinity of the project site, there are five major Citywide Bicycle Routes, consisting of Class II and Class III bicycles routes. Class II bicycle facilities are separate bicycle lanes adjacent to the curb lane, while Class III bicycle facilities are signed routes, where bicyclists

share travel lanes with vehicles. There are no Class I bicycle facilities in the study area, which are bike paths separated from the roadway with dedicated paths for bicyclists. The major bicycle routes in the study area are as follows:

- **Route 19** is a north/south Class III facility on Fifth Street between Market Street and Townsend Street.
- **Route 20** is an east/west route that runs along McAllister and Fulton Streets. Route 20 is a Class III facility on McAllister Street and Grove Street, and a Class II facility on Fulton Street.
- **Route 23** is a north/south primarily Class II facility that runs along Seventh Street in the northbound direction from Townsend Street and along Eighth Street in the southbound direction. The route continues south of Townsend to Mission Bay on Seventh Street.
- **Route 30** is an east/west Class II facility that runs along Folsom and Howard Streets between The Embarcadero and 14th Street.
- **Route 50** is an east/west primarily Class III facility that runs the length of Market Street from The Embarcadero to Castro Street.

The potential for conflicts between vehicles and bicycles along Market Street is due to moderate bicycle traffic and right-turning vehicles. Due to heavy pedestrian volumes along Market Street, there is also the potential for conflicts between bicycles and pedestrians at crosswalks. In general, there are no safety hazards or existing conditions that create a substantial safety hazard to bicyclists within the project vicinity.

After completion of CEQA review and certification of the EIR by the Planning Commission, the SFMTA Board voted to adopt the *San Francisco Bicycle Plan* on June 26, 2009. The *San Francisco Bicycle Plan* proposes a package of near-term improvements, including the upgrade of Route 19 (Fifth Street) to a Class II facility (striped bicycle lanes). The upgrade of Route 19 was among the 45 near-term improvements that were legislatively approved at the time that the *San Francisco Bicycle Plan* was formally adopted. Under the newly adopted *San Francisco Bicycle Plan*, the Fifth Street Bicycle Lanes project would add northbound and southbound bicycle lanes on Fifth Street between Mission and Townsend Streets and would add sharrows⁸ in the northbound and southbound directions on Fifth Street between Market and Mission Streets.⁹

Bicycle counts were conducted on a Wednesday in September 2007 at the midday and PM peak periods. The heaviest bicycle traffic is in the westbound direction on Market Street during the

⁸ Sharrows are traffic control devices which consist of pavement markings within the traffic lane. The markings are intended to alert drivers that bicyclists share the traffic lane and also to reduce the chance of bicyclists colliding with the open doors of parked vehicles. For more information on sharrows, please see <http://www.dot.ca.gov/hq/traffops/signtech/mutedsupp/pdf/camutcd/CAMUTCD-Part9.pdf>.

⁹ This bicycle project will not be implemented until the City obtains relief from the current injunction preventing the installation of bicycle facilities.

weekday PM peak hour, with approximately 270 bicycles. Approximately 70 bicycles headed in the eastbound direction, while bicycle traffic in the northbound and southbound directions along Fifth Street was minimal.

Parking

Existing parking conditions were analyzed in an area bounded by Ellis Street to the north, Howard Street to the south, Fourth Street to the east, and Seventh Street and Leavenworth Street to the west (see Figure IV.C.3: Parking Key Map). Existing on-street conditions were determined for the weekday midday period (1:00 PM to 3:00 PM). A survey of weekday midday occupancy at the 18 off-street parking facilities was conducted in September 2007. The project site and the parking study area are not within any residential permit parking areas.

On-Street Parking

On-street parking in the study area was approximately 80 to 90 percent occupied throughout the day and generally completely occupied (100 percent occupied) during the weekday peak period. On-street parking in the vicinity of the project site consists of metered or time-limited parallel parking spaces. Most of the metered parking is limited to 30-minute or one-hour duration, or for loading vehicles only during business hours. On-street parking is prohibited during the weekday AM and PM peak periods (7:00 AM to 9:00 AM and 3:00 PM to 7:00 PM) along the east side of Sixth Street between Market Street and Brannan Street. On-street parking is also prohibited on Mission Street between Fifth and Seventh Streets during the weekday PM peak period (3:00 PM to 7:00 PM).

Short-term parking is typically available on Stevenson Street. One-hour parking is provided in 19 spaces on the south side of Stevenson Street between Fifth and Sixth Streets; no parking is provided on the north side due to the narrow width of the street. In addition to regular private vehicles, delivery/service trucks park in the on-street spaces on the south side of Stevenson Street as well as illegally double-parking on the north side of the street.

Off-Street Parking

A survey of weekday midday occupancy at the 18 off-street public parking facilities was conducted in September 2007, and the results are summarized below in Table IV.C.3. While many of the smaller lots in the vicinity of the project site are operating near or at capacity, the three largest facilities – the Fifth/Mission Garage, the Ellis/O'Farrell Garage, and the Union Square Garage – all operate with a surplus of available spaces. Overall, there are over 5,800 off-street parking spaces in the vicinity of the project site; about 1,500 of these were unoccupied at the time of the parking survey.



SOURCE: AECOM

CITYPLACE

2005.1074E

FIGURE IV.C.3: PARKING KEY MAP

Table IV.C.3: Off-Street Parking Supply and Occupancy – Weekday Midday Period

Facility	Parking Supply	Parking Occupancy	Occupancy Rate
USP Parking Lot	170	125	74%
Priority Parking Lot	57	38	67%
Best Western Americana Lot	29	19	66%
Priority Parking Lot	100	95	95%
Place 2 Park Lot	43	43	100%
Fifth & Mission Garage	2,585	1,629	63%
Pickwick Garage ^a	37	37	100%
Pacific Place Garage	100	55	55%
Ellis/O'Farrell Garage	950	773	81%
Union Square Garage	985	822	83%
Discount Public Parking Lot ^a	110	110	100%
Hotel Warfield Lot	18	17	94%
Ambassador Hotel Structure/Lot	200	164	82%
USP Parking Lot ^a	62	62	100%
Turk Street Garage	190	160	84%
Star Park Lot	20	20	100%
Super Parking Structure	65	45	69%
Central Parking Systems Lot ^a	130	130	100%
Total	5,851	4,344	74%

Note:

^a This facility operates with a parking attendant who parks vehicles in parking lot aisles; therefore, the supply was increased to reflect the total amount of parked cars observed during the parking surveys.

Source: AECOM, October 2009

Loading Conditions

Existing loading conditions were examined along Market Street and Stevenson Street adjacent to the project site during the weekday morning (6:30 AM to 7:30 AM) and afternoon (2:30 PM to 3:30 PM) periods.

Market Street

On the south side of Market Street, there are two on-street loading zones; one is a 60-foot-long loading zone in front of 935-939 and 941-945 Market Street (two of the three buildings on the project site) and the other is a 100-foot-long loading zone in front of 969 and 973 Market Street just west of the project site. Together, the two zones provide enough space for three to five service vehicles or for two semi trucks. These zones are designated for trucks with six or more wheels, with a 30-minute time limit. An on-street loading zone occupancy survey indicated that the easternmost loading zone was occupied during both the morning (6:30 AM to 7:30 AM) and afternoon (2:30 PM to 3:30 PM) periods. These spaces are typically occupied during the peak

loading periods, and vehicles using these zones tend to dwell in the loading area for longer than the posted time limit.

Stevenson Street

There is one 40-foot-long dedicated yellow loading zone located on the south side of Stevenson Street opposite the rear of the 969 Market Street building. Use of this loading zone is restricted to 30 minutes Monday through Friday, between 7:00 AM and 6:00 PM. Trucks that deliver goods to the properties along Stevenson Street west of the project site use the 40-foot-long yellow loading zone or the loading zone on Stevenson Street at Sixth Street; however, there are instances where trucks double-park along Stevenson Street by pulling partially onto the north sidewalk. Since Stevenson Street is currently one way and about 21 feet wide from curb to curb, vehicles are able to drive around trucks double-parked on the north sidewalk. An off-street loading activity survey conducted in March 2009 indicated that Marshalls, at 901 Market Street, received a delivery from one 30-foot-long truck between 5:30 AM and 7:30 AM. Deliveries are typically scheduled for this time period. A 30-foot truck required two maneuvers to back into the off-street loading dock near the Fifth Street/Stevenson Street intersection. These maneuvers are generally performed when on-street parking spaces are vacant and there is little to no traffic.

Sixth Street

On the east side of Sixth Street, there are two dedicated loading zones for service vehicles just south of Market Street. These two spaces are metered and limited to service vehicles during normal business hours (8:00 AM to 6:00 PM). These spaces are not always used and are typically available, because most service vehicles serving the land uses fronting on the south side of Market Street use the Market Street loading zones before using the spaces on Sixth Street.

IMPACTS

This section presents the significance criteria used by the San Francisco Planning Department to assess transportation impacts; estimates the proposed project's travel demand, parking demand, and loading demand; and evaluates the potential transportation impacts that would result from the implementation of the proposed project. Impacts in the areas of traffic, transit, pedestrians, bicycles, parking, loading, and construction are presented for two scenarios – Existing Plus Project Conditions and 2030 Cumulative Conditions.

Significance Criteria

The following significance criteria for transportation are used by the San Francisco Planning Department to determine the significance of transportation impacts associated with a proposed project.

Traffic: Intersection Level of Service

The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection Level of Service to deteriorate from LOS D or better to LOS E or LOS F, or from LOS E to LOS F. The operational impacts on unsignalized intersections are considered potentially significant under either of two conditions: (1) project-related traffic would cause the Level of Service at the worst approach to deteriorate from LOS D or better to LOS E or LOS F and MUTCD signal warrants would be met; or (2) project-related traffic would cause MUTCD signal warrants to be met when the worst approach is already operating at LOS E or LOS F.

A proposed project may result in significant adverse traffic circulation impacts at intersections that already operate at LOS E or LOS F under existing conditions depending upon the magnitude of the proposed project's contribution to the worsening of the average delay per vehicle. In addition, a proposed project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in Levels of Service to unacceptable levels.

Transit

A proposed project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by nearby transit lines, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs so that significant, adverse impacts on transit service levels could result. With the MUNI and regional transit screenlines analyses, a proposed project would have a significant effect on the transit provider if project related transit rider trips would cause the capacity utilization service standard (MUNI) or the one hour loading factor to be exceeded during the PM peak hour. As described on pp. IV.C.13 – IV.C.14, MUNI's capacity utilization service standard is 85 percent; BART has a one-hour load factor standard of 135 percent; and the other regional transit agencies have a one-hour load factor standard of 100 percent.

Parking

San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant

impacts on the environment. However, environmental documents should address the secondary physical impacts that a social impact could trigger (CEQA Guidelines Section 15131(a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service, in particular, would be in keeping with the City's Transit First policy.¹⁰

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle-trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise, and pedestrian safety analyses, reasonably address potential secondary effects.

Pedestrians

A proposed project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

Bicycles

A proposed project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.

¹⁰ The City's Transit First Policy, established in the City's Charter Section 8A.115 (formerly Section 16.102), provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

Loading

A proposed project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed

on-site loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

Construction

Construction-related impacts, depending on the size of a project, generally would not be considered significant due to their temporary nature and limited duration.

PROJECT TRAVEL DEMAND

The travel, parking, and freight/service loading demand estimates for the proposed project were based on the methodology and assumptions developed by the San Francisco Planning Department and published in the *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (*SF Guidelines*).

Trip Generation

The person-trip generation for the proposed retail use includes trips made by employees and visitors. The weekday daily trip generation rate from the *SF Guidelines* is 150 trips per 1,000 square feet for retail uses. The weekday PM peak hour trip generation is 9.0 percent of the daily trip generation.

It is expected that a substantial portion of prospective shoppers visiting the proposed project would visit other stores in the area. Reductions were taken into account based on results of surveys of existing shopping patterns in downtown San Francisco. The results of these surveys showed that visitors to large value-oriented stores (like those proposed as part of the project) typically visit up to three stores (between 1.8 and 2.8) per trip. This is called "cross shopping." The Planning Department approved the use of a cross-shopping factor of 1.8 to account for linked and pass-by trips. The weekday daily trip generation rate was therefore reduced from 150 trips per 1,000 square feet for retail to 83.3 trips per 1,000 square feet.

Additionally, doorway counts were conducted during the weekday PM peak hour at the existing uses on the project site that were occupied when the transportation analysis was initiated in 2007. These counts were used to determine the trip generation for the existing land uses that would be eliminated as a result of the proposed project. Since the project involves the demolition of the

existing buildings on the site, these trips would be removed from the nearby network; they were subtracted from project trip generation calculations to avoid overestimating the project's impacts on transportation infrastructure.

Table IV.C.4 presents the net weekday daily and PM peak hour person trips and includes the cross-shopping factor. The proposed project would generate approximately 19,112 net new person trips (inbound and outbound) on a weekday daily basis and 1,720 net new person trips during the weekday PM peak hour.

Table IV.C.4: Net Project Person-Trip Generation

Land Use	Size	Weekday Daily Person-Trips	Weekday PM Peak Hour Person-Trips
Retail (Project)	264,145 sq ft	22,012	1,981
Existing Uses	–	(2,900)	(261)
Net-New Project Trips		19,112	1,720

Note:

This table reflects the project person-trip generation after the application of the cross-shopping factor of 1.8.

Source: AECOM, October 2009

Mode Split

The project-generated person trips are assigned to travel modes in order to determine the number of auto, transit, walk, and "other" trips ("other" trips include bicycle, motorcycle, taxi, and additional modes). Mode split information for the proposed retail use was taken from the *SF Guidelines* for retail employee and visitor trips to and from the C-3 – Downtown Commercial District. Vehicle occupancy (based on C-3 District data) is then applied to the number of auto person trips to determine the number of vehicle trips generated for each use. The average mode splits for work trips used in this analysis are approximately 31 percent by auto, 58 percent by transit, and 11 percent by walk/other modes. For non-work trips, the average mode splits used are approximately 28 percent by auto, 15 percent by transit, and 56 percent by walk/other modes. The vehicle occupancy rates for work trips and non-work trips are 1.35 persons per vehicle and 1.77 persons per vehicle, respectively.

Table IV.C.5 presents the net new trip generation by mode for the proposed project for the weekday PM peak hour. In total, the proposed project would generate 280 net new vehicle trips during the weekday PM peak hour, of which 132 would be inbound and 148 would be outbound.

Table IV.C.5: Net Project Trip Generation by Mode – Weekday PM Peak Hour

Direction	Person-Trips				Vehicle-Trips
	Auto	Transit	Walk	Other ¹	Total
Inbound	234	126	368	98	826
Outbound	255	166	374	99	894
Total	489	292	742	197	1,720

Note:

¹ "Other" mode includes bicycles, motorcycles, taxis, and additional modes

Source: AECOM – October 2009

Trip Distribution/Assignment

The trips generated by a project are distributed to the four quadrants of San Francisco (Superdistricts 1, 2, 3 and 4), East Bay, North Bay, South Bay/Peninsula and outside the region, based on the origin/destination of each trip. The distribution of project-generated trips was obtained from the *SF Guidelines* for retail use. These distribution patterns are used as the basis for assigning project-related vehicle trips to the local and regional roadway network and transit trips to the local and regional transit operators (see Table IV.C.6.)

Table IV.C.6: Trip Distribution Patterns

Place of Trip Origin/Destination	Retail	
	Work	Non-Work
San Francisco		
Superdistrict 1	14.1%	8.0%
Superdistrict 2	15.7%	8.0%
Superdistrict 3	19.9%	12.0%
Superdistrict 4	12.0%	4.0%
East Bay	22.7%	15.0%
North Bay	2.9%	10.0%
South Bay	11.1%	5.0%
Out of Region	1.6%	38.0%
Total	100%	100%

Source: *SF Guidelines*, AECOM - October 2009

Parking Demand

Parking demand consists of both long-term demand (typically employees) and short-term demand (typically patrons). For retail uses, the long-term parking demand is derived by estimating the number of employees and applying the mode split and average vehicle occupancy from the trip generation calculations, and the short-term parking demand is estimated based on the total daily visitor trips and an average turnover rate. The proposed project would result in a weekday midday (generally 1:00 PM to 3:00 PM) parking demand of approximately 480 spaces, of which 173 would be long-term (employee) and 307 would be short-term (customer) parking.

Loading Demand

Loading demand consists of the number of delivery and service vehicle-trips generated by a project, plus the number of loading spaces that would be required to accommodate the demand. The number of daily delivery/service vehicle trips is estimated based on the size of each land use and a truck trip generated rate (specific to each land use). The number of loading spaces necessary to accommodate this demand is based on the anticipated hours of operation, turnover of loading spaces, and an hourly distribution of trips. The information and rates used in the loading demand analysis were obtained from the *SF Guidelines* for the proposed retail use.

The proposed project would generate approximately 58 delivery/service vehicle trips per day, which would result in a demand for 2.7 spaces in the average hour and 3.4 spaces during the peak hour of loading activities. These estimates are somewhat conservative since the analysis did not take a credit for the elimination of loading trips associated with the existing uses at the project site.

EXISTING PLUS PROJECT CONDITIONS

Traffic and Circulation Impacts

The proposed project would generate 132 net inbound and 148 outbound vehicle trips during the weekday PM peak hour. The net new project weekday PM peak hour vehicle trips were added to existing traffic volumes to obtain Existing Plus Project traffic volumes. All net new project vehicles were assigned to the proposed parking garage with access from Stevenson Street (inbound from Sixth Street and outbound to Fifth Street). After the project trips were assigned to the roadway network, the operational performance of each study intersection was then reevaluated to determine if the project would cause any significant traffic-related impacts. The results of this analysis are summarized in Table IV.C.7.

Intersection Operations

Based on observations of existing conditions, cars occasionally use the clearly marked bus-only lanes in the Market and Mission Street corridors as normal travel lanes. The intersection LOS for the study intersections was, therefore, analyzed both with and without enforcement of the existing bus-only lanes (see Table IV.C.7). As described in the Existing Conditions subsection on p. IV.C.7, adjustment factors were applied to the Market and Mission Street intersections to more clearly represent the conditions on the street, and the determination of significance is based on the without-transit-lane-enforcement scenario.

Table IV.C.7: Intersection LOS – Existing Plus Project Conditions

	Intersection	Existing Conditions		Existing Plus Project Conditions		Impact Y/N
		LOS	Delay	LOS	Delay	
1.	Fourth Street/Market Street	F	>80.0	F	>80.0	N
	<i>With Transit Lane Enforcement</i>	F	>80.0	F	>80.0	
2.	Fourth Street/Mission Street	C	28.7	C	29.0	N
	<i>With Transit Lane Enforcement</i>	D	39.1	D	39.7	
3.	Fifth Street/Market Street	C	27.0	C	28.6	N
	<i>With Transit Lane Enforcement</i>	C	28.2	C	30.1	
4.	Fifth Street/Stevenson Street ^a	D	27.6	E	44.1	Y
5.	Fifth Street/Mission Street ^b	C	29.5	D	40.9	N
	<i>With Transit Lane Enforcement</i>	C	31.8	D	43.5	
6.	Fifth Street/Howard Street	C	22.3	C	25.2	N
7.	Sixth Street/Market Street	C	29.1	C	30.2	N
	<i>With Transit Lane Enforcement</i>	C	31.0	C	32.2	
8.	Sixth Street/Stevenson Street ^a	C	21.9	C	22.0	N
9.	Sixth Street/Mission Street	D	36.7	D	39.1	N
	<i>With Transit Lane Enforcement</i>	D	40.8	D	42.9	
10.	Fourth Street/Howard Street	D	38.8	D	39.4	N

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes.

^a Stevenson Street intersections at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

^b The *San Francisco Bicycle Plan EIR* analysis included the southbound left turn movement at this intersection. At that time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the *San Francisco Bicycle Plan EIR*.

Source: AECOM, October 2009

The Fourth Street/Market Street intersection is the only intersection that operates at LOS F under the Existing Plus Project Conditions scenario (with and without transit lane enforcement). All other intersections operate at acceptable conditions. Under the Existing Plus Project scenario, all study intersections would continue to operate with acceptable Levels of Service with the exception of the Fourth Street/Market Street (with and without transit lane enforcement) and Fifth Street/Stevenson Street.

The Fourth Street/Market Street intersection currently operates at LOS F. The Fourth Street/Market Street intersection would continue to operate at LOS F with the addition of project-specific traffic with and without transit lane enforcement on Market Street. The addition of project-specific traffic would result in a contribution of approximately 1.0 percent to the increase in traffic volumes and would not be considered a significant contribution to existing volumes. Therefore, the proposed project would have a less-than-significant impact on the Level of Service at this intersection and mitigation is not necessary.

Impact TR-1: Increased traffic volumes due to the proposed project could result in deterioration in the Level of Service at the Fifth Street/Stevenson Street intersection. (*Significant and Unavoidable*)

The Fifth Street/Stevenson Street intersection is an unsignalized intersection that currently operates at LOS D during the PM peak hour. With the addition of all 148 project-specific outbound vehicle trips to this intersection, the Level of Service would deteriorate to LOS E. In addition, the 13 project-specific vehicles attempting to turn left onto Fifth Street, across two lanes of traffic, would cause queues to spill back to the portion of Stevenson Street where it is a one-lane roadway (approximately 415 feet west of Fifth Street), potentially blocking vehicles attempting to make a right turn at Fifth Street.

Project-generated vehicle trips would degrade the intersection LOS from D to E and would meet MUTCD signal warrants (indicating the need to signalize the intersection) resulting in a significant impact. Three potential mitigation measures were considered: installation of a mid-block traffic signal at Fifth Street (Mitigation Measure M-TR-1a), prohibition of eastbound left turns onto Fifth Street from Stevenson Street (Mitigation Measure M-TR-1b), and striping Stevenson Street for two-way road operation between Sixth Street and the proposed garage entry/exit (Mitigation Measure M-TR-1c). Each of these mitigation measures has the potential to mitigate the project's impact at this intersection; however, implementation of any of these measures would result in secondary project-related impacts, as discussed below under "Transportation Mitigation Measures and Improvement Measures." These mitigation measures have been determined to be infeasible.

Impacts due to Proposed Loading Dock and Parking Garage on Stevenson Street

The proposed project would provide a parking garage and an off-street loading dock with access on Stevenson Street, resulting in additional vehicle and truck traffic on Stevenson Street and at the intersections of Fifth Street/Stevenson Street and Sixth Street/Stevenson Street.

Emergency Vehicle Access

During times of peak traffic along Stevenson Street, there is potential for the vehicle queues at the project garage entrance to delay emergency vehicles. The project-related modifications to on-street parking and sidewalk configurations have been designed to provide adequate access for emergency vehicles and have been reviewed by the San Francisco Fire Department.¹¹ Therefore, this impact would be less than significant. However, Improvement Measure I-TR-C, pp. IV.C.54

¹¹ San Francisco Fire Department, Memorandum re: proposed improvements on Stevenson Street dated September 16, 2008. This memorandum is included as Appendix G of the *Transportation Study*, which is on file and available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, in Case File Number 2005.1074E.

to IV.C.55, would encourage the project sponsor to work with the owner of the building on the northeast corner of the Sixth Street/Stevenson Street intersection (995 Market Street) to install a "Parking Lot Full" sign on that building. In the event that a sign is not able to be installed on 995 Market Street, a "Parking Lot Full" sign would be installed on the project site. With the installation of a sign, substantial queues would not be expected to form on Stevenson Street as a result of vehicles waiting to enter the proposed parking garage, thus reducing the potential for conflicts between queued vehicles and emergency vehicles.

Impact TR-2: Large trucks accessing Stevenson Street to serve the proposed project and adjacent land uses would adversely impact operations on Stevenson Street and at the intersections of Sixth Street/Stevenson Street and Fifth Street/Stevenson Street. (*Less than Significant with Mitigation*)

The volume of vehicle and truck traffic on Stevenson Street would be expected to increase as a result of the parking garage and loading dock proposed as part of the project. Large trucks (over 30 feet long) accessing Stevenson Street and the land uses on the project site, as well as adjacent land uses, have the potential to lengthen queues and increase traffic conflicts on Stevenson Street and at the Fifth Street/Stevenson Street and Sixth Street/Stevenson Street intersections. Trucks less than 30 feet in length would be able to turn onto Stevenson Street from Sixth Street and exit Stevenson Street at the Fifth Street intersection with minimal effects on traffic conditions.

Due to the narrow width of Stevenson Street and the radius of the curb returns at the Sixth Street/Stevenson Street intersection, large trucks headed north on Sixth Street would have difficulty turning right onto Stevenson Street. Large trucks would have to turn from the inside lane and cross another travel lane, make a three-point turn, or mount the curb and use the Sixth Street sidewalk to enter Stevenson Street. This maneuver would create the potential for conflicts with vehicles on Sixth Street as well as with pedestrians using the sidewalk or crossing the intersection. The traffic delays and safety concerns that these actions would generate are considered significant impacts.

Upon entering Stevenson Street, large trucks accessing the proposed loading dock on the project site would temporarily block vehicles traveling eastbound on Stevenson Street. These potential conflicts would result in traffic delays on Stevenson Street that could generate queues spilling back to the Sixth Street/Stevenson Street intersection. However, the anticipated daily loading activities are not expected to be frequent enough to cause this conflict to be considered significant. Nonetheless, as described in detail below, Mitigation Measure M-TR-2, p. IV.C.52, would, among other things, implement a loading dock scheduling program and prohibit trucks greater than 30 feet in length from accessing Stevenson Street between 6:00 AM and 10:00 PM. Therefore, the potential significant impact would be reduced to a less-than-significant level.

After exiting the proposed loading dock, large trucks leaving Stevenson Street and headed south on Fifth Street would have difficulty turning right from Stevenson Street due to the street's narrow width and the radius of the curb returns at the Fifth Street/Stevenson Street intersection. Large trucks headed south would have to travel into the inside lane on Fifth Street. This movement would require a gap in southbound traffic in both lanes sufficiently long to allow a large truck to enter southbound Fifth Street. Large trucks attempting to go northbound on Fifth Street would be expected to wait even longer for a gap in traffic in both directions to occur prior to turning left onto northbound Fifth Street. Waiting for these gaps in traffic during peak travel periods would likely create queues on Stevenson Street. The delay to other vehicles that this may cause would result in a significant impact to operating conditions on Stevenson Street.

Mitigation Measure M-TR-2, p. IV.C.52, has been identified to lessen the impact of large trucks entering and exiting Stevenson Street. This mitigation measure would establish a loading dock scheduling program for each retail tenant limiting the loading period for trucks larger than 30 feet to the hours between 10:00 PM and 6:00 AM; prohibit all truck loading to the proposed project site between 3:00 PM and 6:00 PM due to the PM period tow-away lane on northbound Sixth Street; prohibit retail tenants from using trucks longer than 45 feet; station a loading dock manager on-site to enforce the loading dock schedule; and work with adjacent businesses to provide access to the loading dock during times of low use and to minimize the potential for double parking of trucks on Stevenson Street. Implementation of this mitigation would reduce the impacts on Stevenson Street and at the Sixth Street/Stevenson Street intersection to less-than-significant levels. In addition, Improvement Measure I-TR-D, p. IV.C.55, has been suggested to educate the proposed project's retail tenants about the loading dock time restrictions and truck size limitations, which would help minimize the number of large trucks accessing Stevenson Street outside the 10:00 PM and 6:00 AM period.

Implementation of Mitigation Measure M-TR-2 would be expected to reduce potential conflicts between vehicles traveling eastbound on Stevenson Street and large trucks accessing the proposed loading dock and/or adjacent land uses. In addition to Improvement Measure I-TR-D, Improvement Measures I-TR-E and I-TR-F have been identified to manage the loading activities related to the proposed project and to adjacent land uses (see p. IV.C.55). The two additional improvement measures would encourage the project sponsor to make reasonable efforts to work with adjacent tenants and landowners to establish an area-wide freight management system and would allow service vehicles accessing nearby properties to use the proposed loading dock between the hours of 6:00 AM and 10:00 PM. However, as noted in the comment letter from the adjacent property to the west, this option may not be feasible for all nearby uses.

Transit Impacts

Local Transit

Ridership

The proposed project would generate 126 inbound and 166 outbound transit trips during the weekday PM peak hour. The outbound transit trips within San Francisco were assigned to the four MUNI screenlines, while those outside of San Francisco were distributed to the three regional transit screenlines.

Based on the trip distribution patterns described on p. IV.C.25, six transit trips would have an origin and destination within downtown, e.g., trips to Union Square or SoMa, and would not cross a screenline. These six trips were excluded from the screenline analysis. The remaining 160 outbound trips were then distributed to the appropriate screenlines, as follows:

- MUNI screenlines (77 total trips):
 - Northeast: 17 project transit trips
 - Northwest: 25 project transit trips
 - Southeast: 21 project transit trips
 - Southwest: 14 project transit trips
- Regional screenlines (83 total trips):
 - East Bay: 50 project transit trips
 - North Bay: 22 project transit trips
 - South Bay: 11 project transit trips

The existing MUNI screenlines operate at approximately 68 percent of capacity during the weekday PM peak hour, with an hourly ridership of about 20,609 passengers and an hourly capacity of about 30,373 passengers. The 77 MUNI trips generated by the project would result in a 0.4 percent increase in ridership across all the MUNI screenlines. Proposed changes to MUNI service, identified as part of the TEP and approved by the SFMTA Board in June 2009, could improve transit service in the vicinity of the project site. However, each of the proposed changes could only be implemented upon completion of the required environmental assessment. Given that there is capacity with existing operations for approximately 10,000 additional passengers, the 77 PM peak hour passengers generated by the proposed project could be accommodated. The proposed project would have a less-than-significant impact on MUNI. To encourage employees to use transit, Improvement Measure I-TR-B, p. IV.C.54, is identified calling for a transit pass program or other implementation of the requirements in Environment Code Section 421.

Operations

Fifth Street

The additional vehicle trips generated by the proposed project are expected to create the potential for minor conflicts with MUNI bus operations on Fifth Street. The project-generated vehicular traffic on southbound Fifth Street may result in delays for the 27-Bryant buses that use this street. During the weekday PM peak hour, 135 project-generated vehicles are estimated to exit Stevenson Street and head southbound on Fifth Street. Five MUNI buses are currently scheduled to operate there during the weekday PM peak hour (one bus every 12 minutes). Based on the MUNI TEP recommendations, six buses would be scheduled for the weekday PM peak hour service in the future (one bus every 10 minutes). Due to the relatively infrequent service of the 27-Bryant bus line, the project-generated traffic would not result in substantial delays to bus operations and this impact would be less than significant.

Mission Street

Vehicles traveling to and from the proposed parking garage have the potential to conflict with the MUNI bus lines on Mission Street. Currently, 134 vehicles turn right from westbound Mission Street to northbound Sixth Street. The project is expected to add 63 vehicles onto westbound Mission Street during the typical weekday PM peak hour. Of these 63 vehicles, 45 are expected to turn right at the Mission Street/Sixth Street intersection. Currently, there are 17 MUNI buses scheduled to operate on westbound Mission Street during the weekday PM peak hour. Based on the TEP recommendations, 24 buses (14, 14L, and 14X) would operate on this segment of Mission in the future during the weekday PM peak hour.

Parking is restricted on Mission Street during the weekday PM peak period, so westbound vehicles on Mission Street turning right onto northbound Sixth Street are able to use the parking lane. However, since this additional space is not striped as a travel lane or turn pocket, most vehicles tend to make their right-turn movement from the through travel lane, which is the lane reserved for buses and right-turning vehicles. Vehicles waiting to make the right turn (such as vehicles waiting for pedestrians to cross) therefore tend to block this travel lane. The proposed project would add 45 vehicles to the westbound right-turn movement during the PM peak hour. The additional project-related vehicles that would turn right from westbound Mission Street to northbound Sixth Street during the PM peak hour would have to use the parking lane in order to avoid conflicts with buses operating on Mission Street since there is no exclusive right turn lane at this intersection. The availability of this lane, therefore, would minimize operational conflicts and the impact would be less than significant.

At the intersection of Sixth Street and Mission Street, the following improvement measure is suggested to reduce the potential for right turning vehicles to interfere with transit vehicles. Once

the proposed project is occupied, the project sponsor would request that the City determine if a formal full-time right-turn pocket is needed at this location. Implementation of a right-turn pocket would require removal of several on-street parking spaces as well as the reconfiguration of yellow metered parking spaces to maintain loading spaces for the area. The striping would be the same as what is currently installed at the westbound approach of Mission Street at Fifth Street. It should be noted that this improvement measure would only be considered once the proposed project is occupied and it is deemed appropriate by SFMTA (see Improvement Measure I-TR-A on p. IV.C.54.)

Large trucks that attempt to access the proposed loading dock on Stevenson Street outside of the specified period, e.g., between 6:00 AM and 10:00 PM, would be directed to the on-street loading zones on Market Street. Trucks accessing these zones may create conflicts with bus operations on Market Street. However, due to the infrequent daily service vehicle trips to the proposed project site, these conflicts are not expected to create significant adverse impacts to transit operations.

Regional Transit

Ridership

The existing regional transit service systems operate at approximately 90 percent of capacity, in aggregate, during the weekday PM peak hour, with an hourly ridership of about 34,613 passengers and an hourly capacity of about 38,307 passengers. Although BART operates at 120 percent of capacity at the East Bay screenline, this is below the BART threshold of 135 percent of seated capacity. Other regional transit service agencies also have available capacity (AC-Transit – 60 percent; SamTrans – 61 percent; Caltrain – 61 percent, and Golden Gate Transit – 63 percent). The available capacity, as calculated at the different regional screenlines, is 102 percent at the East Bay screenline; 59 percent at the North Bay screenline, and 83 percent at the South Bay screenline. The East Bay screenline capacity is over 100 percent because the BART threshold is 135 percent of seated capacity. In sum, the different regional transit service systems would accommodate the 83 PM peak hour passengers because all have available capacity. Therefore, the proposed project would have a less-than-significant impact on regional transit service systems.

Pedestrian Impacts

The proposed project would add approximately 1,034 net new pedestrian trips to the pedestrian network around the project site. The net new pedestrian trips generated by the proposed project would include walk trips to and from the site, to and from nearby transit lines, and to and from parked vehicles that are not parked in the proposed project's parking garage. The majority of pedestrians walking to and from the project site, including some from transit lines or from off-site

parking (Fifth/Mission, Union Square, and Ellis/O'Farrell garages), would access the proposed retail center via the Market Street entrances. Increased pedestrian activity on Stevenson Street is also expected because of the separate entries for the ground-floor retail proposed to front on Stevenson Street at the western end of the project site.

The addition of project-generated walk trips to the existing heavy pedestrian volumes on Market Street can be accommodated because there is sufficient space for the free flow movement of pedestrians. Although the Market Street sidewalk is 30 feet wide, crowding does occur at sidewalk queuing areas such as bus stops and crosswalks during weekday peak periods and on weekend and holiday peak activity periods. This is expected to continue under the Existing Plus Project scenario. The proposed project would add the equivalent of 15 pedestrians per cycle at the Fifth Street/Market Street intersection. Since there is a sufficient space to accommodate the additional pedestrians, the sidewalk queuing areas or crosswalks would not be overloaded. Therefore, this impact would be less than significant.

The increased pedestrian volumes at the Fifth Street/Mission Street intersection resulting from project-related parking at the Fifth/Mission garage would add to the already high volume of people crossing the channelized northbound right turn lane. Because vehicles traveling northbound on Fifth Street yield to pedestrians on the eastbound right turn to Mission Street, a small number of pedestrian/vehicle conflicts were observed at this location under existing conditions. The increased number of project-generated pedestrians queuing at this intersection would result in crowding during peak periods. Pedestrian/vehicle conflicts would not increase, as cars tend to yield when large numbers of pedestrians move through an intersection. The effect of increased pedestrian volumes crossing the channelized turn lane, therefore, would be a potential reduction to the vehicular capacity of the northbound right-turn movement. The increased use of the Fifth/Mission garage would also add to the volume of people crossing the Mission Street mid-block crosswalk, located between Fourth and Fifth Streets at the garage's mid-block pedestrian entry. However, the project-related increase in pedestrian volumes at this location could be accommodated within the existing free-flow operations. As a result, the project-generated pedestrians that would travel across the Fifth Street/Mission Street intersection or the Mission Street mid-block crossing would not adversely affect existing pedestrian conditions.

When the proposed parking garage is full, the majority of retail shoppers would use the Fifth/Mission garage because it is closer to the project site and has a higher number of unoccupied spaces than other nearby garages. However, a portion of the retail shoppers would use the Union Square and Ellis/O'Farrell parking garages. As a result, the majority of project-generated pedestrians would walk along Mission, Fifth, and Market Streets to access the project site. Although a smaller number of retail shoppers would use the Union Square and Ellis/O'Farrell garages, the number of project-generated pedestrians in the Union Square area would increase. Project-related vehicles headed to the garages would add traffic to the road

network and the subsequent walk to and from the project site would add shoppers to the pedestrian network. Pedestrian activity in this area is generally heavier than that in the vicinity of the Fifth/Mission garage, with minor overcrowding at sidewalk corners and crosswalks around the Union Square area during periods of peak shopping activity, especially near the Union Square and Ellis/O'Farrell parking garages. The project-related increase in the total number of pedestrians in the Union Square area would result in an overall increase in pedestrian activity in this area. However, the increase would be low, as the majority of the project-generated pedestrians would travel between the project site and the Fifth/Mission garage. Therefore, the proposed project would have a minimal effect on pedestrian conditions in the Union Square area and would not adversely affect existing conditions.

A parking garage, a loading dock, and ground-floor retail spaces are proposed at the rear of the project site on the north side of Stevenson Street. In addition, the rear of the project site along Stevenson Street would be improved with the addition of new street trees, planters, public art, and the development of a mini-plaza at the mid-block. These changes require the removal of 13 parking spaces on the south side of the street: five for access to the loading dock; five for the project-specific improvements associated with the Stevenson Street greening project; two to the west of the project site to be reconfigured as a loading zone to replace the existing loading area behind 969 Market Street, to provide adequate space for parking garage access; and one east of the project site to be reconfigured as a yellow loading zone. Removing these spaces would remove the existing buffer between moving traffic and pedestrians on the south sidewalk. In addition to the greening improvements along the project frontage, the existing bollards along the 7-foot-wide north sidewalk would provide new and existing pedestrians with physical separation from the project-related increase in Stevenson Street traffic. With these changes, pedestrian volumes (primarily on the north sidewalk) as well as vehicle traffic on Stevenson Street would increase and pedestrian conditions would worsen in comparison to existing conditions.

The potential for pedestrian/vehicle conflicts on Stevenson Street would increase at the intersections of Stevenson Street with Fifth and Sixth Streets where vehicles and trucks access or exit Stevenson Street and where vehicles and trucks cross the north sidewalk to enter or exit the garage and the loading dock, respectively. The proposed project's contribution to the number of vehicles and trucks exiting at the Fifth Street/Stevenson Street intersection would significantly degrade the traffic Level of Service at this intersection – from 27.6 seconds of delay per vehicle (LOS D) to 44.1 (LOS E). A rise in the number of pedestrian/vehicle conflicts could potentially result from the addition of 148 project-related vehicles to this intersection during the PM peak hour. Under existing conditions the number of conflicts observed at the Stevenson Street/Fifth Street intersection was low. The increase in the number of vehicles turning left (13 vehicles) or right (135 vehicles) from Stevenson Street to Fifth Street is not substantial enough to adversely affect pedestrian conditions at these intersections.

Vehicles that cross the north sidewalk of Stevenson Street to enter and exit the proposed garage would create new opportunities for pedestrian/vehicle conflicts, as the number of pedestrians and vehicles on Stevenson Street is expected to increase. Trucks that access the proposed loading dock would represent an increase in overall loading activities and would also create new opportunities for pedestrian/truck conflicts. Project-related loading would occur throughout the day, with delivery trucks less than 30 feet in length accessing Stevenson Street at any time.¹² The existing number of conflicts associated with pedestrian operations on the north sidewalk and vehicles/trucks serving the land uses along the north side of Stevenson Street is low. Although the potential for the conflicts would increase as a result of the proposed project, the incremental increase would not result in a significant impact because the changes associated with the proposed project are not substantial enough to adversely affect existing pedestrian conditions.

Mitigation measures and improvement measures proposed to mitigate or minimize other project-related transportation impacts would also help minimize conflicts between pedestrians and service vehicles on Stevenson Street at the proposed project's parking garage and loading dock and at its intersection with Sixth Street. Mitigation Measure M-TR-2, p. IV.C.52, would limit loading for project-related trucks over 30 feet long to the hours between 10:00 PM and 6:00 AM when pedestrian activity is expected to be low and would establish a dock supervisor who could help decrease the potential for pedestrian/truck conflicts at the loading dock and at the Sixth Street/Stevenson Street intersection.

To further minimize the potential for vehicle and pedestrian conflicts at the proposed loading dock and garage, Improvement Measures I-TR-G, I-TR-H, and I-TR-I described on p. IV.C.55, would encourage the project sponsor to install pedestrian warning device(s), mirrors, and pedestrian signs, respectively. Overall, the changes to Stevenson Street would not significantly affect pedestrian conditions.

Bicycle Impacts

There are several bicycle routes in the vicinity of the project site, including major east-west and north-south routes on Market Street and Fifth Street, respectively. With the current bicycle and traffic volumes on the adjacent streets, bicycle travel generally occurs without major impedances or safety problems. During the weekday PM peak hour, the project is expected to add vehicle, truck, and bicycle traffic to the roadway network in the vicinity of the project. During this time the majority of bicycle trips would be outbound trips. Bicycles leaving the project site would likely leave via the Market Street lobby (using elevators from the garage). However, some bicyclists may choose to use the parking garage driveway with access to Stevenson Street. Although there are some existing conflicts between bicycles and other modes of travel, including

¹² Other businesses on Stevenson Street may continue to have deliveries from trucks longer than 30 feet.

automobiles, transit, and pedestrians, the addition of the project bicycle trips to the roadway network would not substantially affect transportation operations in the vicinity. In addition, the project-related increase in the number vehicles and trucks on the surrounding streets during the PM peak period would not be large enough to affect bicycle travel on these corridors. Therefore, the proposed project would result in a less-than-significant impact and mitigation is not necessary.

Planning Code §155(j) states that except as provided by Section 155.1 and Section 155.2, for each 20 off-street parking spaces provided, one or more bicycle parking spaces shall be provided. The most restrictive provisions of 155(j) or 155.4 shall prevail. *Planning Code* §155.4 (d)(4)(3) requires that where the gross square footage of the floor area of a commercial building whose primary use is retail exceeds 100,000 square feet, 12 bicycle spaces be provided. *Planning Code* §155.2 (c)(2) requires that garages offering between 120 and 500 automobile parking spaces provide one or more bicycle spaces for every 20 automobile spaces, which results in a minimum requirement of 12 bicycle parking spaces. These bicycle parking spaces can be either Class 1 or Class 2 facilities.¹³ In addition, the project would be required to provide four showers and eight lockers pursuant to §155.3(d)(3) of the *Planning Code*. The provision of 21 bicycle parking spaces at the B2 garage level, as well as end-of-the trip facilities (i.e. showers and lockers) would meet, and in some cases exceed, the *Planning Code* requirements. As stated, the location of the bicycle parking spaces is currently on the upper level of the garage. In order to optimize the use of the bicycle parking spaces, Improvement Measure I-TR-J, p. IV.C.55, has been proposed to facilitate access. In addition, the project sponsor intends to install bike racks on the Market Street sidewalk as part of the project.¹⁴

Parking Impacts

There are 19 existing on-street parking spaces on the south side of Stevenson Street; 13 would be removed or reconfigured as part of the project. Five spaces across from the southwest portion of the project site would be removed as part of the Stevenson Street Greening Improvements; five spaces across from the southeast portion of the project site would be removed to provide access to the proposed project's loading dock; two spaces about 55 feet west of the project site would be reconfigured as a loading zone to replace the loading area proposed to be removed across from 969 Market Street to provide adequate space for an eastbound vehicle to enter the project parking

¹³ A Class 1 bicycle space protects the entire bicycle from theft or weather; examples include lockers or monitored parking. A Class 2 bicycle space is a bicycle rack, which allows the frame and one wheel of the bicycle to be locked to the rack.

¹⁴ Installation of bicycle racks on Market Street would require approval from the San Francisco Municipal Transportation Agency. No bicycle racks may be installed until the injunction prohibiting the implementation of bicycle facilities within the City has been lifted.

garage; and one space, east of the project site, would be reconfigured to a yellow loading zone to provide a loading space for the uses east of the proposed project.

Pursuant to the *Planning Code*, no parking is required for the proposed project. However, the project sponsor plans to provide parking on site as an accessory use. *Planning Code* §204.5 states that for parking to be considered an accessory use, the number of spaces provided shall not exceed 7 percent of the total gross floor area of the structure (excluding driveways and ramps). If the parking exceeds this amount, the project's parking is defined as a "Major Parking Garage" and the project sponsor must apply for Conditional Use authorization pursuant to *Planning Code* §157 and §158. The project's parking area per the above requirements consists of approximately 15 percent of the total gross floor area. Therefore, the project sponsor intends to seek a Conditional Use authorization to address the provision of 201 parking spaces. In addition, the ADA requires at least seven handicapped-accessible parking spaces. The project proposes seven ADA-compliant spaces adjacent to elevators on the B2 level, which would meet this requirement.

Based on parking demand rates from the *SF Guidelines*, the proposed project would generate a parking demand of 480 spaces in the weekday midday period. With 201 parking spaces, the proposed parking supply would not meet the estimated parking demand and would result in a shortfall of approximately 279 spaces during the weekday midday peak. The loss of 13 on-street parking spaces on Stevenson Street would increase this shortfall to 292 spaces.

Existing parking facilities in the vicinity of the project site operate at an average of 74 percent capacity during the weekday midday period, and the closest garages (Fifth/Mission and Ellis/O'Farrell) have approximately 1,100 spaces available in the aggregate. Overall, there are over 1,500 available off-street spaces within the project vicinity. With implementation of the proposed project, the occupancy rate for nearby parking garages during the weekday midday period would increase from an average of 74 percent to 78 percent. Therefore, sufficient supply of parking is available to accommodate the proposed project's surplus parking demand, including the displaced parking demand from the removal of the existing on-street parking spaces on Stevenson Street, and the proposed project would not result in a significant parking impact.

As a means of addressing the potential formation of vehicle queues on Stevenson Street, the project sponsor may implement a series of improvement measures that could include the installation of a "Parking Lot Full" sign on the Stevenson Street side of the 995 Market Street building at the Sixth Street/Market Street intersection, or on the project site in the event that a sign is not able to be installed on the 995 Market Street building; installation of parking space counters at each level of the proposed parking garage to better direct drivers; provision of real-time counts for available spaces in the proposed parking garage in conjunction with the "Parking Lot Full" sign; directions to nearby parking facilities if substantial queues occur on a consistent basis; and valet parking for customers (see Improvement Measures I-TR-C, I-TR-K, I-TR-L, I-TR-M, and I-TR-N, pp. IV.C.54 - IV.C.56).

Loading Impacts

Pursuant to *Planning Code* §152.1, 11 off-street loading spaces are required for the proposed project. Based on loading demand rates from the *SF Guidelines*, the project would generate a loading demand of 2.7 spaces in the average hour and 3.4 spaces in the peak loading hour. The proposed project would provide three off-street loading spaces and one space for a waste compactor, all with access via Stevenson Street. Prospective retail tenants would also have access to the two existing on-street loading bays on Market Street, the two metered loading spaces on Sixth Street, the on-street yellow loading zone on Stevenson Street opposite the rear of the 969 Market Street building (which is proposed to be relocated to about 50 feet west of the project site as part of the project), the on-street loading space on Stevenson Street at Sixth Street, and the proposed on-street loading space just east of the project site, adjacent to the Martin Building on the south side of Stevenson Street. The three loading spaces provided as part of the project would meet the average hour loading demand but not the peak demand. However, a loading dock study conducted by the project sponsor indicated that the proposed loading supply would be sufficient if tenants' service and delivery needs were coordinated, with a one-hour delivery "window" for each tenant group.¹⁵ Therefore, the proposed project would be able to accommodate the loading demand generated by the prospective retail tenants, and loading activities generated by the proposed project would have a less-than-significant impact on traffic conditions on Stevenson Street and at the intersections of Sixth Street/Stevenson Street and Fifth Street/Stevenson Street. Because *Planning Code* §152.1 requirements to provide 11 off-street loading spaces would not be met as part of the proposed project, the project sponsor plans to seek an exception pursuant to *Planning Code* Section 309 of the *Planning Code*.

The *Planning Code* also specifies required minimum loading dock dimensions as 36 feet deep and 12 feet wide with 14 feet of vertical clearance. The proposed loading dock would be 44 feet deep, 12 feet wide and have 14 feet of vertical clearance, meeting code-required loading dock dimensions. The design of the proposed loading dock was dictated by the need to ensure that each of the loading bays be independently accessible and that trucks entering and exiting the loading bay be able to do so in one maneuver. A truck access evaluation indicated that the proposed loading dock could accommodate trucks up to 45 feet long.¹⁶ A similar evaluation was performed to assess the feasibility of 30- to 45- foot long trucks entering Stevenson Street from Sixth Street and trucks exiting to Fifth Street from Stevenson Street. Northbound trucks on Sixth Street would have to turn from the leftmost lane and cross the right travel lane to access Stevenson Street, causing traffic conflicts. Southbound trucks on Sixth Street would have to cross two northbound travel lanes to access Stevenson Street, but there would be sufficient room

¹⁵ See *Transportation Study*, Appendix I "Project Sponsor's Loading Dock Study."

¹⁶ See *Transportation Study*, Appendix J "Truck Access Evaluation Report - Stevenson Street and Loading Dock."

to make this maneuver without causing traffic conflicts. Trucks exiting Stevenson Street onto southbound Fifth Street would have to turn into the leftmost (or inner) lane, crossing a travel lane in the process. Trucks turning onto the leftmost (inner) lane of northbound Fifth Street would have to cross both southbound travel lanes and impinge on the rightmost (outer) lane of northbound Fifth Street. If sufficient space is not available on northbound Fifth Street to accommodate the truck, this maneuver may briefly block southbound traffic. Due to these constraints, loading operations for large trucks would need to be scheduled during time periods that coincide with minimal levels of traffic on Fifth Street and Sixth Street, e.g., during the 10:00 PM to 6:00 AM time period, and a loading dock manager would be needed to assist with truck access on Stevenson Street (see Mitigation Measure M-TR-2 on p. IV.C.52).

The access evaluation concluded that when the depth of the loading bays, the width of Stevenson Street, and the turning radii at the intersections of Stevenson Street/Sixth Street and Stevenson Street/Fifth Street are taken into consideration the use of trucks larger than 45 feet is not feasible. Trucks between 30 and 45 feet would be able to access Stevenson Street but access would need to be limited to the hours between 10:00 PM to 6:00 AM to ensure that truck-related conflicts on Stevenson Street, Sixth Street, and Fifth Street are minimized to less-than-significant levels.

Retail center developments that share similar characteristics, such as size, tenant mix, and downtown urban setting, with the proposed project typically use 35-foot trucks for deliveries. The proposed project's retail tenants are expected to operate similarly. If a truck greater than 45 feet did attempt to access Stevenson Street, the difficulties in both accessing Stevenson Street and the loading dock would generate traffic conflicts due to the wider turning radius required for trucks of this length. This movement would also create the potential for conflicts with pedestrians on Sixth Street and Stevenson Street. To avoid this an improvement measure has been identified that would prohibit the project's retail tenants from using trucks larger than 45 feet to deliver goods to the proposed project site unless the use of smaller trucks is not a viable option, in which case, the retail tenants would be encouraged to use the loading bays on Market Street with the understanding that double-parking on Stevenson Street is prohibited (see Improvement Measure I-TR-O on p. IV.C.56). An additional improvement measure would educate the retail tenants on the limitations of Stevenson Street as well as the mitigation measure to limit access by project-related trucks between 30 and 45 feet in length to the hours between 10:00 PM and 6:00 AM (see Improvement Measure I-TR-D on p. IV.C.55 and Mitigation Measure M-TR-2 on p. IV.C.52). However, if a truck larger than 45 feet attempts to access Stevenson Street, the loading dock supervisor (established as part of Mitigation Measure M-TR-2) would direct these trucks to either attempt to load from the Market Street loading bays (if available) or to off-load merchandise and goods to smaller trucks and return to use the loading dock (see Improvement Measure I-TR-P on p. IV.C.56).

Area-Wide Loading Impacts

Impacts on Stevenson Street Traffic: The proposed project would not provide enough loading spaces to meet the peak hour loading demand (3.4 spaces) as calculated using the *SF Guidelines* methodology, or the *Planning Code*-required number of loading spaces (11 spaces), but would meet the average hour loading demand (2.7 spaces) and the project sponsor's estimated demand (3 spaces).

Should the project loading demand exceed the three proposed spaces, trucks may have to wait to access the project dock, which could cause queues to form on Stevenson Street. There are six alternative on-street loading zones/bays that would serve the project site: two on Stevenson Street, two on Market Street, between Sixth and Fifth Streets, and two on Sixth Street between Stevenson and Market Streets. A curb-side yellow loading space proposed for the south side of Stevenson Street east of the project site would also be available, if approved. Existing on-street loading spaces are typically well-used throughout the day, with some periods of availability. Although the project delivery vehicles would have access to these spaces, there is no guarantee that they would be available; and therefore, they cannot be expected to accommodate all the proposed project loading demand. In addition, the use of loading zones and spaces not adjacent to the project site would be an inconvenience to service vehicle operators.

Although these spaces would be less convenient and not guaranteed to be available, trucks for the retail tenants of the proposed project may use these spaces. An improvement measure has been identified which would charge the dock supervisor to direct trucks between 30- and 45-feet long to load from the Market Street zones between 6:00 AM and 10:00 PM, to utilize other on-street loading spaces in the vicinity of the project area, or to off-load merchandise to a smaller truck and return to the loading dock (see Improvement Measure I-TR-Q on p. IV.C.56).

Impacts on Adjacent Land Uses: The loading areas currently available for existing land uses with access to Stevenson Street are:

- Two loading bays on Market Street;
- Two metered loading spaces on Sixth Street;
- Two on-street yellow loading zones on Stevenson Street; and
- On-street parking spaces on Stevenson Street.

Although it is illegal, observations of existing conditions show that delivery/service vehicles double-park on the north sidewalk of Stevenson Street as a common practice. The curb-to-curb width of Stevenson Street (21 feet wide west of the project site) is sufficient enough to allow cars and trucks to pass which minimizes delay and inconveniences experienced by other drivers or adjacent land uses.

With the proposed project, the Market Street and Sixth Street loading zones would continue to be available for the land uses on Stevenson Street. The existing loading space on Stevenson Street at Sixth Street would also continue to be available. The project proposes to remove or reconfigure 13 of the existing 19 on-street parking spaces on Stevenson Street. A total of ten parking spaces on the project's Stevenson Street frontage would be removed as part of the Stevenson Street Greening Improvements and to provide access to the proposed project's loading dock. A yellow loading zone would be striped at a location about 55 feet west of the project site to replace the existing loading zone across from 969 Market Street and would require the removal of at least two parking spaces. This existing loading area would be striped red to provide adequate space for an eastbound vehicle to enter the project parking garage. Although loading for the 969 Market Street building would be less convenient for the occupants, the relocated loading zone would remain usable. The easternmost on-street parking space on Stevenson Street, adjacent to the Martin Building Company property, would be reconfigured to a yellow loading space. This would prevent parking at this space and make it available to the nearby land uses for loading. Existing loading operations in that segment of Stevenson Street currently double-park or park illegally to load/unload goods and materials. The proposed reconfiguration to a yellow zone would provide a central loading space for service vehicles that currently load/unload on Stevenson Street east of the project site.

However, the lack of on-street metered parking may cause more illegal double parking on Stevenson Street for vehicles accessing land uses on Stevenson Street. Double parking on Stevenson Street east of the project site would decrease the storage capacity for vehicles turning onto Fifth Street. Double parking may cause queues and inconvenience for vehicles, but since the street is approximately 21 feet wide, any double parking that occurs would not create a significant adverse impact on traffic because there is sufficient space for cars to maneuver around the double-parked vehicles.

With the proposed project, it is expected that properties west of the project site would continue to use the Stevenson Street, Sixth Street, or Market Street loading zones. Properties to the east of the project site would be expected to use the proposed on-street yellow loading space for deliveries. However, in an effort to further accommodate the loading activities of adjacent property owners and tenants, the project sponsor has identified the following improvement measures:

- Make the project's loading dock available at pre-specified times, e.g., between 6:00 AM and 10:00 PM, for adjacent land uses as long as there is no conflict with the scheduled loading activities for the proposed project (see Improvement Measure I-TR-F on p. IV.C.55).
- Make commercially reasonable efforts to establish an area-wide freight management system (see Improvement Measure I-TR-E on p. IV.C.55).

Impacts on Pedestrians: The increase in truck traffic along Stevenson Street as a result of project loading activities is not expected to cause conflicts with pedestrians attempting to cross Stevenson Street at Sixth Street or Fifth Street. Pedestrian traffic is generally light on this segment of Stevenson Street. However, because of the narrow width of Stevenson Street, northbound trucks over 30 feet long that attempt to turn onto Stevenson Street from Sixth Street would have to start their turns from the leftmost lane (or inner lane) and cross another traffic lane prior to entering Stevenson Street. Trucks over 30 feet long may mount the southwest curb at this intersection, creating a hazardous condition for pedestrians. Depending on the length of the turning radius of the truck, these movements may require additional personnel to assist in directing trucks safely onto Stevenson Street and onto Fifth Street after unloading (see Improvement Measure I-TR-R). Similar difficulties are likely at the Fifth Street/Stevenson Street intersection, where trucks exiting Stevenson Street would likely need to cross multiple lanes to turn left or right onto Fifth Street. The proposed delivery schedule has deliveries arriving during the late night and early morning, when vehicular and pedestrian activities are at low levels.¹⁷ Therefore, these operations are generally not expected to cause significant impacts to vehicular or pedestrian traffic.

Construction Impacts

Construction of the proposed project would take approximately 25 months, with construction-related activities typically occurring Monday through Friday from 7:00 AM to 5:00 PM. Activities on weekends would occur on an as-needed basis. Construction-related trucks would access the project site from Fifth Street, Stevenson Street, and Sixth Street. Construction staging would occur primarily within the project site and from adjacent sidewalks on Market Street and Stevenson Street. The Market Street sidewalk would not need to be completely closed because of its width in front of the project site and pedestrian protection would be erected. However, temporary closure of a portion of the Stevenson Street sidewalks is expected due to the narrow width of Stevenson Street. In order to minimize impacts to traffic and transit operations on Market, Fifth and Sixth Streets, most construction activities would be expected to be conducted from Stevenson Street.

No regular traffic lanes would need to be closed and no MUNI stops would need to be relocated during construction. If it is determined that travel lane closures would be needed, they would be coordinated with the City in order to minimize the impacts on local traffic. In general, lane and sidewalk closures are subject to review and approval by the Department of Public Works (DPW) and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT). If it is determined that temporary MUNI stop relocation would be needed, they would be coordinated with the Muni Street Operations/Special Events office. The project sponsor would also prepare a

¹⁷ See *Transportation Study*, Appendix I "Project Sponsor's Loading Dock Study."

construction management plan and work with MTA Street Operations and Special Events Office to coordinate construction activities to mitigate delays to MUNI buses along Market and Mission Streets (see Improvement Measure I-TR-S on p. IV.C.56). Although the proposed project is not within the BART right-of-way for the BART facilities under Market Street and would not be required to have a permit from BART, the project site is located on Market Street directly adjacent to BART facilities. Based on proximity and the fact that the project would result in excavation to 41 feet below grade, BART recommends permit and plan review. The project sponsor would submit project plans for BART permit and plan review (see Improvement Measure I-TR-T on p. IV.C.56).

Throughout the construction period, there would be a flow of construction-related truck trips into and out of the construction site. It is anticipated that the majority of construction-related truck traffic would use I-80/U.S. 101 and I-280 to access the construction site from the East Bay and the South Bay. In general, the impact of construction truck traffic would be a temporary reduction in the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect both traffic and transit operations.

On a typical day during the first stages of construction, e.g. demolition, excavation, and foundation work, there would be an average of 20 to 25 truck trips. Although trip distribution and mode split data is not available for the construction workers, the addition of the number of daily and peak hour construction worker vehicle-trips and transit-trips would not substantially affect the transportation conditions. As a result, potential impacts to the traffic and transit network would be less than significant due to the temporary duration of construction activities and available capacity in the local traffic and transit network. After the garage portion of the proposed project is constructed, construction workers would be directed to park within the facility. Prior to this time, construction-worker parking would be provided at a nearby off-street parking facility as arranged by the project sponsor.

2030 CUMULATIVE CONDITIONS

Methodology and Approach

The background growth rates (between existing and 2030 Cumulative Conditions) were calculated using travel demand forecasts from the recent San Francisco County Transportation Authority's travel demand model, which includes the planned and programmed development projects in the area and accounts for the proposed project and other projects nearby on Mission and Market Streets. The expected growth between Existing Conditions and 2030 Cumulative Conditions was calculated, and weighted annual growth rates were calculated for each travel direction (north, south, east and west).

Cumulative Traffic Impacts

Intersection Level of Service

The 2030 cumulative intersection operating conditions during the weekday PM peak hour are presented in Table IV.C.8. Under 2030 Cumulative Conditions, traffic volumes are projected to substantially increase throughout the study area, resulting in noticeable increases in the averagedelays per vehicle at the study intersections. Overall, seven of the 10 study intersections would operate with unacceptable service levels (LOS E or F) under 2030 Cumulative Conditions during the weekday PM peak hour; therefore there would be significant cumulative traffic impacts in the future.

Table IV.C.8: Intersection LOS – 2030 Cumulative Conditions

Intersection	Existing Conditions		Existing Plus Project Conditions		2030 Cumulative Conditions	
	LOS	Delay	LOS	Delay	LOS	Delay
1. Fourth Street/Market Street	F	>80.0	F	>80.0	F	>80.0
<i>With Enforcement</i>	<i>F</i>	<i>>80.0</i>	<i>F</i>	<i>>80.0</i>	<i>F</i>	<i>>80.0</i>
2. Fourth Street/Mission Street	C	28.7	C	29.0	D	43.0
<i>With Enforcement</i>	<i>D</i>	<i>39.1</i>	<i>D</i>	<i>39.7</i>	<i>E</i>	<i>60.1</i>
3. Fifth Street/Market Street	C	27.0	C	28.6	D	53.9
<i>With Enforcement</i>	<i>C</i>	<i>28.2</i>	<i>C</i>	<i>30.1</i>	<i>E</i>	<i>57.8</i>
4. Fifth Street/Stevenson Street ^a	D	27.6	E	44.1	E	49.1
5. Fifth Street/Mission Street ^b	C	29.5	D	40.9	E	77.2
<i>With Enforcement</i>	<i>C</i>	<i>31.8</i>	<i>D</i>	<i>43.5</i>	<i>E</i>	<i>77.9</i>
6. Fifth Street/Howard Street	C	22.3	C	25.2	E	77.9
7. Sixth Street/Market Street	C	29.1	C	30.2	E	70.3
<i>With Enforcement</i>	<i>C</i>	<i>31.0</i>	<i>C</i>	<i>32.2</i>	<i>E</i>	<i>77.4</i>
8. Sixth Street/Stevenson Street ^a	C	21.9	C	22.0	D	26.8
9. Sixth Street/Mission Street	D	36.7	D	39.1	E	66.8
<i>With Enforcement</i>	<i>D</i>	<i>40.8</i>	<i>D</i>	<i>42.9</i>	<i>F</i>	<i>>80.0</i>
10. Fourth Street/Howard Street	D	38.8	D	39.4	E	68.2

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

^a Stevenson Street at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

^b The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At that time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the San Francisco Bicycle Plan EIR.

Source: AECOM – October 2009

The following intersections would operate under unacceptable conditions (LOS E or worse):

- The Fourth Street/Market Street intersection would continue to operate at LOS F.
- The Fifth Street/Stevenson Street intersection would continue to operate at LOS E, although with slightly higher average delays. This is due to the increased amount of traffic on northbound and southbound Fifth Street, as traffic on Stevenson Street would not be expected to increase substantially as a result of future growth.
- The Fifth Street/Mission Street intersection would worsen from LOS D to LOS E due to the increased amount of traffic expected in the northbound, southbound, and eastbound directions.
- The Fifth Street/Howard Street intersection would worsen from LOS C to LOS E.
- The Sixth Street/Market Street intersection would worsen from LOS C to LOS E due to the increased amount of traffic expected in the northbound, southbound, and eastbound directions.
- The Sixth Street/Mission Street intersection would worsen from LOS D to LOS E due primarily to the increased amount of traffic expected in the northbound and southbound directions.
- The Fourth Street/Howard Street intersection would worsen from LOS D to LOS E.

The Sixth Street/Stevenson Street, Fourth Street/Mission Street, and Fifth Street/Market Street intersections would operate at LOS D under 2030 Cumulative Conditions. Under the with-transit-lane-enforcement scenario, the LOS at the Fourth Street/Mission Street and Fifth Street/Market Street intersections would degrade from LOS D to LOS E. As discussed previously on p. IV.C.7, enforcement of the transit-only lanes on Market and Mission Streets is not a basis for making significance findings. As a result, project-related traffic would not represent a cumulatively considerable contribution to the adverse cumulative conditions at these two intersections.

Project Contribution to Cumulative Impacts

To assess the effect of project-generated traffic on 2030 Cumulative Conditions, the proposed project's contribution to the 2030 cumulative traffic volumes was determined. Two different percentages were calculated: project-generated traffic as a percent of total 2030 cumulative traffic volumes, and project-generated traffic as a percent of the increase in traffic volumes between Existing and 2030 Cumulative Conditions. The percent contributions were calculated at the study intersections that would operate at LOS E or F under 2030 Cumulative Conditions and are presented in Table IV.C.9.

Table IV.C.9: Contribution to 2030 Cumulative Conditions

Intersection	Existing Volume	Project Volume	2030 Volume	Contribution To		Impact Y/N
				Total	Growth	
1. Fourth Street/Market Street	2,282	13	2,842	0.5%	2.3%	N
4. Fifth Street/Stevenson Street	1,510	177	1,995	8.9%	36.5%	Y
5. Fifth Street /Mission Street	2,829	167	3,588	4.7%	21.7%	Y
6. Fifth Street /Howard Street	3,219	116	3,996	2.9%	14.9%	N
7. Sixth Street/Market Street	2,961	20	3,624	0.6%	3.0%	N
9. Sixth Street/Mission Street	3,482	164	4,300	3.8%	20.0%	N
10. Fourth Street /Howard Street	3,901	23	4580	0.5%	3.4%	N

Note: **Bold** denotes intersections operating at unacceptable levels under 2030 Cumulative Conditions.

Source: AECOM – October 2009

All seven study intersections would experience increases in cumulative traffic volumes due to anticipated background traffic growth causing the LOS to worsen to LOS E or F under 2030 Cumulative Conditions. The proposed project would contribute 3.4 percent or less of the growth in traffic volumes at the Fourth Street/Market Street, Sixth Street/Market Street, and Fourth Street/Howard Street intersections, and between 14.9 percent and 36.5 percent of the growth at the remaining intersections. At the Fifth Street/Stevenson Street and Fifth Street/Mission Street intersections, the proposed project's share of cumulative traffic growth would result in significant impacts, because the proposed project would contribute traffic to the critical movement(s) at these intersections (see Table IV.C.10.) The proposed project would contribute little or no traffic to the critical movements at the Fourth Street/Market Street, Fifth Street /Howard Street, Sixth Street/Market Street, Sixth Street/Mission Street, and Fourth Street/Howard Street intersections. The additional traffic, if any, would not represent a cumulatively considerable contribution to the adverse cumulative conditions.

Impact TR-3: The proposed project's contribution to critical vehicle movements at the Fifth Street/Stevenson Street intersection would result in a cumulatively considerable contribution to the significant adverse cumulative traffic impact. (*Significant and Unavoidable*)

At the Fifth Street/Stevenson Street intersection, the proposed project's contribution to the growth in traffic volumes between Existing and 2030 Cumulative Conditions would be 36.5 percent. The proposed project would add traffic to the eastbound left turn (13 vehicles) and eastbound right turn (135 vehicles) movements, both of which are critical movements that would operate at LOS F under the 2030 Cumulative Conditions. The project's contributions to the eastbound left and right turn movements would be 35.1 percent and 63.7 percent, respectively. Therefore, the proposed project's traffic would represent a cumulatively considerable contribution to the adverse cumulative impact at the Fifth Street/Stevenson Street intersection.

Table IV.C.10: Contribution to Critical Movements - 2030 Cumulative Conditions

Intersection	Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
1. Fourth Street/Market Street	SBT	F	0	-	N
	EBT	F	2	0.4%	
4. Fifth Street/Stevenson Street	EBL	F	13	35.1%	Y
	EBR	E	135	63.7%	
5. Fifth Street /Mission Street	SBT	F	104	12.5%	Y
	EBT	D	0	-	
6. Fifth Street /Howard Street	NBT	F	0	-	N
	WBT	C	12	0.8%	
7. Sixth Street/Market Street	NBT	F	14	1.0%	N
	EBT	D	6	1.5%	
9. Sixth Street/Mission Street	SBT	F	0	-	N
	EBT	D	0	-	
10. Fourth Street /Howard Street	SBR	F	7	1.4%	N
	WBT	D	12	0.8%	

Source: AECOM – October 2009

The proposed project's contribution to cumulative impacts could be reduced to a less-than-significant level with the installation of a mid-block traffic signal at the intersection (see Mitigation Measure M-TR-3 on p. IV.C.54). However, implementation of this mitigation measure would result in secondary impacts, discussed in more detail in "Transportation Mitigation and Improvement Measures." The mitigation measure has been determined to be infeasible and the impact would be significant and unavoidable. Other mitigation measures discussed for the Fifth Street/Stevenson Street intersection in M-TR-1b and M-TR-1c were considered in relation to cumulative impacts and were found not to reduce impacts to less-than-significant levels.

Impact TR-4: The proposed project's contribution to critical vehicle movements at the Fifth Street/Mission Street intersection would result in a cumulatively considerable contribution to the significant adverse cumulative traffic impact. (*Significant and Unavoidable*)

At the Fifth Street/Mission Street intersection, the proposed project's contribution to the growth in traffic volumes between Existing and 2030 Cumulative Conditions would be 21.7 percent. The proposed project would add traffic to the southbound through movement (104 vehicles) but not the eastbound through movement. The southbound through movement is a critical movement that would operate at LOS F under the 2030 Cumulative Conditions. The project's contributions to the southbound through movement would be 12.5 percent. Therefore, the proposed project's traffic would represent a cumulatively considerable contribution to the significant adverse cumulative impact at the Fifth Street/Mission Street intersection.

A mitigation measure to extend the restriction of northbound and southbound left turns to taxis and buses would improve intersection operations to LOS D (see Mitigation Measure M-TR-4, p. IV.C.54). With implementation of this mitigation measure, the project's contribution to cumulative impacts would be reduced to a less-than-significant level. However, the feasibility of this mitigation measure is uncertain at this time. Therefore, this impact would remain significant and unavoidable.

TRANSPORTATION MITIGATION AND IMPROVEMENT MEASURES

This subsection presents the transportation mitigation measures that would be necessary to reduce the impacts of the proposed project to less-than-significant levels under the Existing Plus Project and the 2030 Cumulative Conditions scenarios. In addition, improvement measures have been identified that would improve operating conditions where there would be less-than-significant impacts.

MITIGATION MEASURES FOR EXISTING PLUS PROJECT CONDITIONS

Traffic and Circulation

The proposed project would result in significant impacts at the Fifth Street/Stevenson Street intersection. The addition of 148 project vehicles to the left turn and right turn movements on eastbound Stevenson Street would degrade the intersection LOS from D to E. The use of large trucks to serve the proposed retail center would increase the volume of truck traffic on Stevenson Street. Large trucks would have to cross multiple lanes of traffic to enter and exit Stevenson Street resulting in vehicle delays as well as pedestrian and traffic safety hazards on Stevenson Street and at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections.

Implementation of any of the Mitigation Measure M-TR-1 options would improve the LOS at the study intersection and reduce the impacts to a less-than-significant level. However, all three options would cause significant secondary impacts. As described below, Mitigation Measures M-TR-1a to M-TR-1c have been determined to be infeasible by SFMTA. Therefore, the impacts at the intersection of Fifth Street and Stevenson Street remain significant and unavoidable.

Implementation of Mitigation Measure M-TR-2 would improve operations on Stevenson Street and minimize the potential conflicts and safety hazards at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections by restricting the delivery hours of large truck (longer than 30 feet) to nighttime hours between 10:00 PM and 6:00 AM. The operational and safety impacts, therefore, would be reduced to a less-than-significant level.

Mitigation Measure M-TR-1a: Install a mid-block traffic signal at the Fifth Street/Stevenson Street intersection.

- *Secondary Impacts:* The proximity of a mid-block traffic signal at the Fifth Street/Stevenson Street intersection to the intersections at Market and Mission Streets would result in increased queue lengths at the adjacent intersections. The increased queue lengths would result in operational problems at the mid-block and at the Market Street and Mission Street intersections. Furthermore, in downtown San Francisco, mid-block traffic signals are discouraged as a matter of policy. Therefore, this mitigation measure would be infeasible.

Mitigation Measure M-TR-1b: Prohibit left turn movements from Stevenson Street to Fifth Street.

- *Secondary Impacts:* The prohibition of left turns at the Fifth Street/Stevenson Street intersection would shift eastbound left turning vehicles (approximately 34 vehicles – 21 existing and 13 project-related) to the eastbound right-turn movement and adversely affect the Nordstrom's store valet service on the east side of Fifth Street north of Stevenson Street. The reassignment of existing and project-related vehicles to the eastbound right-turn movement to southbound Fifth Street would not be accommodated easily, and the additional traffic has the potential to adversely impact the Fifth Street/Mission Street intersection. In addition, the prohibition of left turns onto Fifth Street from Stevenson Street would adversely affect the Nordstrom's store valet service on the east side of Fifth Street north of Stevenson Street. Therefore, this mitigation measure would be infeasible.

Mitigation Measure M-TR-1c: Remove eight on-street parking spaces and two yellow loading zones on Stevenson Street west of the project site and reconfigure Stevenson Street to two-way traffic between the project site and Sixth Street.¹⁸

- *Secondary Impacts:* The proposed reconfiguration of Stevenson Street to two-way operation would primarily cause secondary impacts on traffic and loading conditions. The conversion of the western half of Stevenson Street (between the project site and the Sixth Street/Stevenson Street intersection) from one-way eastbound to two-way traffic flow would be accomplished by restriping the western half of Stevenson Street for one lane in each direction and removing eight existing on-street parking spaces and two existing loading zones on the south side of the street. Implementation of the Stevenson Street reconfiguration would provide more direct access from the project site, allowing for exiting vehicles destined to the north to leave via a northbound right turn at Sixth Street instead of a left turn at Fifth Street or a series of right turns at Fifth Street, Mission Street, and Sixth Street.

¹⁸ Converting Stevenson Street to two-way operations would require approval from the SFMTA Board and other City agencies and departments.

Based on the project vehicle trip distribution, the proposed reconfiguration of Stevenson Street would result in the redistribution of project traffic to the westbound approach at the Sixth Street/Stevenson Street intersection during the weekday PM peak hour.

Implementation of Mitigation Measure M-TR-1c would mitigate the proposed project's impact on Fifth Street/Stevenson Street eastbound left-turn movements, but would cause increased delay at the Sixth Street/Market Street intersection. Although delay would increase, this intersection would continue to operate at an acceptable LOS. All other study intersections would continue to operate with similar service levels as without the proposed reconfiguration.

As a result of additional traffic exiting via Sixth Street, land uses west of the project site would experience additional project traffic fronting their properties on Stevenson Street. This could potentially impact their loading operations and private vehicle access. Specifically, any double parking that could occur on Stevenson Street between Sixth Street and the project site would block one direction of traffic, which could lead to queues extending back onto Sixth Street. Therefore, the potential for double parking and its potential effects on Stevenson Street that would result from the two-way reconfiguration is considered a significant impact. However, this mitigation measure has been determined to be infeasible.

With the reconfiguration of Stevenson Street to two-way operation, trucks accessing Stevenson Street from Sixth Street would have less room to enter Stevenson Street when a vehicle is waiting to make a westbound right or left turn. The potential conflicts between vehicles waiting on the westbound approach and trucks entering from Sixth Street would create significant adverse impacts to traffic by causing delays and presenting unsafe conditions to other drivers.

Loading: The removal of the two existing loading zones and eight on-street parking spaces to accommodate the new westbound lane could affect loading operations of adjacent land uses on Stevenson Street west of the project site. Additional vehicles on this portion of Stevenson Street may also affect loading vehicles accessing adjacent land uses.

In summary, the proposed reconfiguration of Stevenson Street to two-way operation may cause inconvenience to drivers accessing adjacent land uses, and double parking on this section of Stevenson Street would present a significant secondary traffic impact. Reconfiguration would also result in conflicts between trucks waiting to access Stevenson Street from Sixth Street and automobiles leaving Stevenson Street westbound from the proposed garage. Although other mitigation and improvement measures would reduce the significant impacts of this mitigation measure, this measure is not considered feasible because it would cause significant impacts and substantial truck/vehicle conflicts.

Mitigation Measure M-TR-2: Establish a loading dock scheduling program for each project retail tenant; limit loading of project-related trucks greater than 30 feet to the hours between 10:00 PM and 6:00 AM every day; prohibit all project-related truck loading to the proposed project between 3:00 PM and 6:00 PM due to the P.M peak period tow-away lane on northbound Sixth Street; prohibit project retail tenants from using trucks longer than 45 feet; station the proposed project's loading dock manager on site to help direct trucks of all sizes into and out of the loading dock, to control traffic on Stevenson Street at all times the loading dock is available for loading activity, to implement and enforce the dock scheduling program; and work with the owners of other land uses on Stevenson Street to incorporate their loading activities in the loading dock when the proposed project's retail uses do not need the loading dock spaces, with the intent of providing safe off-street loading spaces to nearby land uses and minimizing double parking of trucks on Stevenson Street.¹⁹

Transit

No mitigation measures would be required, since the addition of transit riders generated by the proposed project would not result in any significant impacts during the weekday PM peak hour. In addition, the vehicle trips generated by the proposed project would not result in any substantial conflicts with transit operations. The proposed project would be subject to SFMTA's Transit Impact Development Fee 2, which would address any service impacts of the proposed project.

Pedestrians

No mitigation measures would be necessary, because the addition of pedestrians generated by the proposed project would not result in any significant impacts during the weekday midday and PM peak hours.

Bicycles

The proposed project proposes shower and locker facilities for use by retail employees, which meets *Planning Code* requirements. In addition, the vehicle trips generated by the proposed project would not result in any substantial conflicts with bicycle operations. Therefore, no mitigation measures would be necessary.

Parking

No mitigation measures have been proposed, because the project's parking demand could be accommodated on the project site and in surrounding parking facilities, and because the shortage of parking is not considered a significant impact on the environment.

¹⁹ With respect to working with owners of other land uses, it should be noted that at least one of the adjacent businesses is uncertain that this opportunity would be feasible. Nonetheless, the mitigation measure addresses the effects of project-related loading and truck trips.

Loading

The proposed project would meet the average hour loading demand and the project sponsor's estimate of loading demand with three off-street loading spaces, but would not meet the peak hour loading demand as calculated using the *SF Guidelines*. The design of the proposed loading dock would meet code-required dimensions. If the proposed loading supply was not sufficient to meet demand, there is currently capacity available in the Market Street loading zones and Sixth Street loading spaces which could be used by project vehicles. No loading mitigation measures are necessary to reduce loading impacts. Because *Planning Code* §152.1 requirements to provide 11 off-street loading spaces would not be met as part of the proposed project, the project sponsor plans to seek an exception pursuant to *Planning Code* Section 309 of the *Planning Code*.

Mitigation Measure M-TR-2, described above, would lessen the impacts associated with the increased number of large trucks accessing Stevenson Street. Improvement Measures I-TR-D, I-TR-E, I-TR-F, I-TR-O, I-TR-P, and I-TR-Q have been identified to ensure the proposed loading configuration does not create any adverse effects to loading operations for the proposed project or nearby land uses that also use Stevenson Street for loading operations (see Improvement Measures on pp. IV.C.55 - IV.C.56).

Construction

No mitigation measures would be necessary, because construction of the proposed project would not substantially affect traffic, transit, pedestrian, or bicycle circulation. Impacts from construction activities would not be considered significant because they would be temporary and of limited duration.

2030 CUMULATIVE PLUS PROJECT CONDITIONS MITIGATION MEASURES

Traffic and Circulation

The proposed project would contribute considerably to cumulative significant impacts at the Fifth Street/Stevenson Street and Fifth Street/Mission Street intersections. A new traffic signal was considered as mitigation to reduce the project-specific impact at the Fifth Street/Stevenson Street intersection, but the secondary impacts that would result from implementation of Mitigation Measure M-TR-3 make it infeasible. The cumulative impact at the Fifth Street/Stevenson Street intersection would remain. Restricting northbound and southbound left turns for all vehicles at the Fifth Street/Mission Street intersection was identified as mitigation to reduce project-specific impacts at this intersection. Mitigation Measure M-TR-4, identified below, would improve intersection operating conditions from LOS E to LOS D. However, this mitigation measure has been determined to be infeasible.

Mitigation Measure M-TR-3: Installation of a new traffic signal at the Fifth Street/Stevenson Street intersection would improve operations from LOS E to LOS D. Although the installation of a mid-block traffic signal is physically possible, a mid-block traffic signal at this location would result in operational problems at the adjacent Market Street/Fifth Street and Mission Street/Fifth Street intersections. Therefore, this mitigation measure is not feasible and the impact remains significant and unavoidable (see discussion under Mitigation Measure M-TR-1a on p. IV.C.50.)

Mitigation Measure M-TR-4: Extend the restriction on northbound and southbound left turns at the Fifth Street/Mission Street intersection to taxi and bus movements to improve intersection operating conditions from LOS E (77.2 seconds of delay per vehicle) to LOS D (50.4 seconds of delay per vehicle). However, this turn restriction is not considered feasible. Therefore, this impact remains significant and unavoidable

IMPROVEMENT MEASURES

The following improvement measures would help reduce traffic, transit, pedestrian, bicycle, parking and loading impacts identified as less than significant in the Existing Plus Project scenario.

Improvement Measure I-TR-A: The project sponsor would request that the City (SFMTA and/or DPW) establish a right turn pocket on the westbound approach of the Sixth Street / Mission Street intersection. Creating a right turn pocket would require the removal of several on-street parking/loading spaces on the westbound approach of Mission Street to restripe the parking lane as a full-time right turn pocket. To maintain on-street loading facilities in the area, this would require the reconfiguration of adjacent regular metered parking spaces to yellow metered spaces to replace the existing loading spaces that would be removed to accommodate the turn pocket. The striping could be similar to what is currently installed at the westbound approach of Mission Street at Fifth Street. It should be noted that the creation of a right turn pocket would be considered by SFMTA once the proposed project is occupied.

Improvement Measure I-TR-B: Establish a transit pass program that would offer tax incentives or benefits to retail employees who use transit to and from the proposed project, or otherwise implement the requirements of Environment Code Chapter 421.

Improvement Measure I-TR-C: Install a sign stating "Parking Lot Full" on the rear of the building located at 995 Market Street, at the Sixth Street/Stevenson Street intersection. This sign would be used to warn patrons that the proposed project's parking garage is full and allow motorists to look for another parking facility near the project site, possibly without using Stevenson Street or the Fifth Street/Stevenson Street intersection. This sign would be affixed to the side of the building so that it is visible to oncoming vehicles on Sixth Street so drivers could read it and continue to other facilities without turning onto Stevenson Street. The project sponsor

would make commercially reasonable efforts to work with nearby property owners to install a fixed sign. However, if this were not achievable, the project sponsor would install a permanent sign near the parking garage entrance that can be activated from inside the garage by parking garage operators. This sign would be used to warn patrons that the garage is full and redirect them to an additional parking facility near the proposed project site. This sign would be affixed to the side of the building so that it is visible to eastbound vehicles on Stevenson Street.

Improvement Measure I-TR-D: Educate the retail tenants about the limitations of Stevenson Street and the mitigation measure to restrict access to Stevenson Street for trucks between 30 and 45 feet to night hours (between 10:00 PM to 6:00 AM).

Improvement Measure I-TR-E: Make commercially reasonable efforts to work with adjacent tenants and property owners to establish an area-wide freight management system.

Improvement Measure I-TR-F: Make the proposed project's loading dock available at pre-specified times for adjacent land uses that would not coincide with the scheduled loading activities for the proposed project, e.g., between 10:00 PM and 6:00 AM.

Improvement Measure I-TR-G: Install a pedestrian warning system near the project driveway and loading docks to caution pedestrians on Stevenson Street when a driver approaches the exit. This device should be selected and positioned in such a way as to minimize any noise impacts to nearby residents.

Improvement Measure I-TR-H: Install mirrors on both sides of the driveway opening and loading dock opening to provide a line-of-sight for pedestrians and drivers.

Improvement Measure I-TR-I: Pursuant to the *San Francisco Better Streets Plan*, install signage on Stevenson Street alerting drivers to the unique pedestrian nature of the street.

Improvement Measure I-TR-J: Maintain the bicycle storage facilities on the top level of the garage or relocate to street level, and provide convenient and direct access to these facilities.

Improvement Measure I-TR-K: Install parking space counters on each public parking level to direct drivers to available parking spaces.

Improvement Measure I-TR-L: In conjunction with the proposed "Parking Lot Full" sign, provide real-time notification before entering the garage on the number of available spaces.

Improvement Measure I-TR-M: Provide direction to other nearby facilities via signs, a website, or map handouts, should substantial queues occur on a consistent basis.

Improvement Measure I-TR-N: Provide valet parking for customers during seasonal demand peaks, at the discretion of the parking garage owner.

Improvement Measure I-TR-O: Prohibit the retail tenants from using trucks larger than 45 feet to deliver goods to the proposed project. If they cannot use smaller trucks, the retail tenants would be advised that they cannot safely enter Stevenson Street and should plan to use the Market Street loading bays. Retailers would also be advised that in the event these bays are taken, deliveries to the site cannot be made safely or legally, as double-parking on any of the streets surrounding the site is prohibited.

Improvement Measure I-TR-P: Should a truck larger than 45 feet access Stevenson Street at any time, the project's loading dock supervisor should direct these trucks to either attempt to load from the Market Street zones (if available) or to off-load merchandise and goods at another location, transfer them to smaller trucks, and return to use the loading dock. If using smaller trucks is not a viable option, the retail tenants would be encouraged to use the loading zones on Market Street to reduce the potential for double-parking along Stevenson Street.

Improvement Measure I-TR-Q: Should a truck between 30 and 45 feet access Stevenson Street between the hours of 6:00 AM and 10:00 PM, the project's loading dock supervisor should direct these trucks to either attempt to load from the Market Street zones (if available), or to off-load merchandise and goods at another location, transfer the merchandise to smaller trucks and return to use the loading dock. If using smaller trucks is not a viable option, the retail tenants would be encouraged to use the loading zones on Market Street to reduce the potential for double-parking along Stevenson Street.

Improvement Measure I-TR-R: Provide loading dock personnel to assist in directing large trucks (30 feet or greater) onto Stevenson Street from Sixth Street, into and out of the loading dock, and safely onto Fifth Street, when deemed necessary by the project's loading dock manager.

Improvement Measure I-TR-S: Coordinate construction activities with the projects planned at 1066 Market Street, 1036 Mission Street, 942 Mission Street, and 575 Jessie Street (and any others near the project site) to identify any potential conflicts between truck routes or construction traffic control, to reduce traffic congestion and transit disruption.

Improvement Measure I-TR-T: Submit project plans for BART permit and plan review.

D. NOISE

This section describes the fundamentals of environmental noise and evaluates the potential impacts of vehicular traffic noise increases that would result from implementation of the proposed project. This section is based on the *Analysis of Vehicular Traffic Noise for CityPlace*,¹ prepared by Rosen Goldberg Der & Lewitz, Inc.

Temporary, construction-related noise impacts associated with the proposed project are discussed in the Initial Study (see Appendix A). The Initial Study determined that compliance with the San Francisco Noise Ordinance, which is required by law, would reduce construction noise impacts to a less-than-significant level. The Initial Study also discussed groundborne vibration, concluding that monitoring would be required by BART and no significant impacts would occur. Therefore, construction-related noise and vibration impacts are not discussed in this section. The proposed project is located more than two miles from San Francisco International Airport and is not near a private airstrip, as noted in the Initial Study. The Initial Study also noted that the proposed project does not include existing residential uses; existing noise levels would not affect employees or visitors in the proposed building. Therefore, no further consideration of these issues is provided.

SETTING

NOISE FUNDAMENTALS

Sound is described in terms of loudness and pitch. The standard rating of sound loudness (amplitude) measurement is the decibel scale (dB). Since the human ear is not equally sensitive to sound at all pitches (frequencies), a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. Environmental noise loudness is typically measured in terms of the A-weighted decibel scale (dBA). This is a logarithmic scale that provides compensation approximating the sensitivity of the human ear to different pitches. The following terms quantify the effects of community noise on people, depending on the energy of the noise and what time of day the noise occurs:

- L_{max} , the maximum instantaneous noise level of a time-varying sound, is often used to identify the loudness of a single event such as a car passby. The background noise level (or residual noise) is the sound level during the quietest moments and is usually generated by steady sources such as freeway traffic.
- L_{eq} , the equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time, typically 15 minutes to 1 hour.

¹ Rosen Goldberg Der & Lewitz, Inc., *Analysis of Vehicular Traffic Noise for CityPlace*, 30 January 2009. Prepared for Turnstone Consulting. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and available for public review as part of Case File Number 2005.1074E.

- L_{dn} , the day-night average noise level, is a 24-hour average L_{eq} obtained after the addition of a “penalty” of 10 decibels to sound levels occurring during the hours of 10:00 PM to 7:00 AM to account for the greater nighttime sensitivity of people to noise.
- CNEL, the Community Noise Equivalent Level, is the 24-hour average equivalent A-weighted noise level, obtained after the addition of 5 decibels to sound levels in the evening from 7:00 PM to 10:00 PM and after the addition of 10 decibels to sound levels in the night from 10:00 PM to 7:00 AM

The logarithmic decibel scale allows an extremely wide range of acoustic energy to be characterized in a manageable notation. For example, a doubling of acoustic energy is a 3 dB increase in noise perceived by listeners. This is also the minimum change in environmental noise that is recognizable by the human ear outside of a laboratory setting. An energy change of approximately a factor of 10 is required for the human auditory system to perceive a doubling of noise loudness (a 6 to 10 dB increase). On the decibel scale, the sound level of normal talking is about 60 to 65 dB.

Noise levels diminish (or attenuate) as distance from the source increases based on an inverse square rule, depending on how the noise source is physically configured. Sound from a point source, such as a single piece of construction equipment at ground level, attenuates at a rate of 6 dB per doubling of distance. Heavily traveled roads with few gaps in traffic behave as continuous line sources and attenuate roughly 3 dB per doubling of distance.

The frequency components that make the pitch of a noise are also important. Pitch and tone are made of sound pressure oscillations that are reported in cycles per second or Hertz (Hz). The human ear is best equipped to hear mid and high frequencies from about 500 to 15,000 Hz, but it is more insensitive to lower frequencies (below 500 Hz). Low-frequency noise is generally harder to control because it can excite some structures, which then transmit the noise rather than dampen it.

Weather conditions can affect how sound propagates from a source. Ambient temperatures, wind speeds, and the gustiness or relative stability of winds can influence the spread of sounds. Although cloud cover and fog have little direct influence on sound propagation, meteorological conditions that are consistent with low clouds or fog may enhance sound propagation. Calm winds along with fog and cloud cover during temperature inversions (e.g., when a cool marine layer is covered by warmer air) may result in higher sound levels at community locations because noise that would typically spread upward may be redirected to ground level. Similarly, winds without turbulence may increase sound levels downwind and decrease sound levels upwind by redirecting sound towards the downwind direction. Finally, turbulence in the atmosphere caused by gusty or blustery winds tends to reduce outdoor sound propagation by scattering the sound.

EXISTING NOISE CONDITIONS

Noise sensitive land uses are those that may warrant unique measures for protection from intruding noise. Residences and those land uses where sleep interference would be a concern or where serenity and quiet are necessary for the land use to serve its intended purpose (e.g., residences, places of worship, schools, hospitals, assisted living centers, hotels) are considered to be noise sensitive. Ambient noise in the vicinity of the project site is dominated by ground-level motor-vehicle traffic, as it is throughout most of San Francisco. Surface transportation facilities have long been recognized as the major contributor to high noise levels in this urban environment.

The existing noise environment on Stevenson Street is dominated by mechanical equipment noise and local traffic on Stevenson Street. Mechanical equipment noise emanates from several louvered vents on the façades of the commercial and residential buildings on both sides of Stevenson Street. Noise sensitive land uses near the project consist of three residential buildings near the east end of Stevenson. These buildings have windows that face Stevenson Street, but the residential units do not have balconies. Figure IV.D.1: Project Boundary and Noise Measurement Locations, on the next page, shows one continuous 24-hour noise measurement (Location A) and two short-term, 30-minute noise measurements (Locations 1 and 2) along Stevenson Street. These measurements were taken to quantify the noise environment at the existing residences. Table IV.D.1 shows the results of the short-term measurements. Mechanical equipment generates a L_{eq} of between 63 and 75 dBA along Stevenson Street. Traffic along Stevenson Street consists mainly of cars from the Nordstrom's valet lot, trucks that use the area directly adjacent to the existing residences as short-term parking for deliveries, and an off-street loading dock serving 901 Market Street with regular deliveries between 5:30 AM and 7:30 AM. During the short-term measurements, Stevenson Street traffic averaged about 35 cars per hour. Truck passbys were less frequent. The 24-hour monitor registered 20 heavy-truck passbys with a typical L_{max} of 85 dBA. Some of these passbys occurred during nighttime hours. The measured L_{dn} at the long-term monitor was 70 dBA.

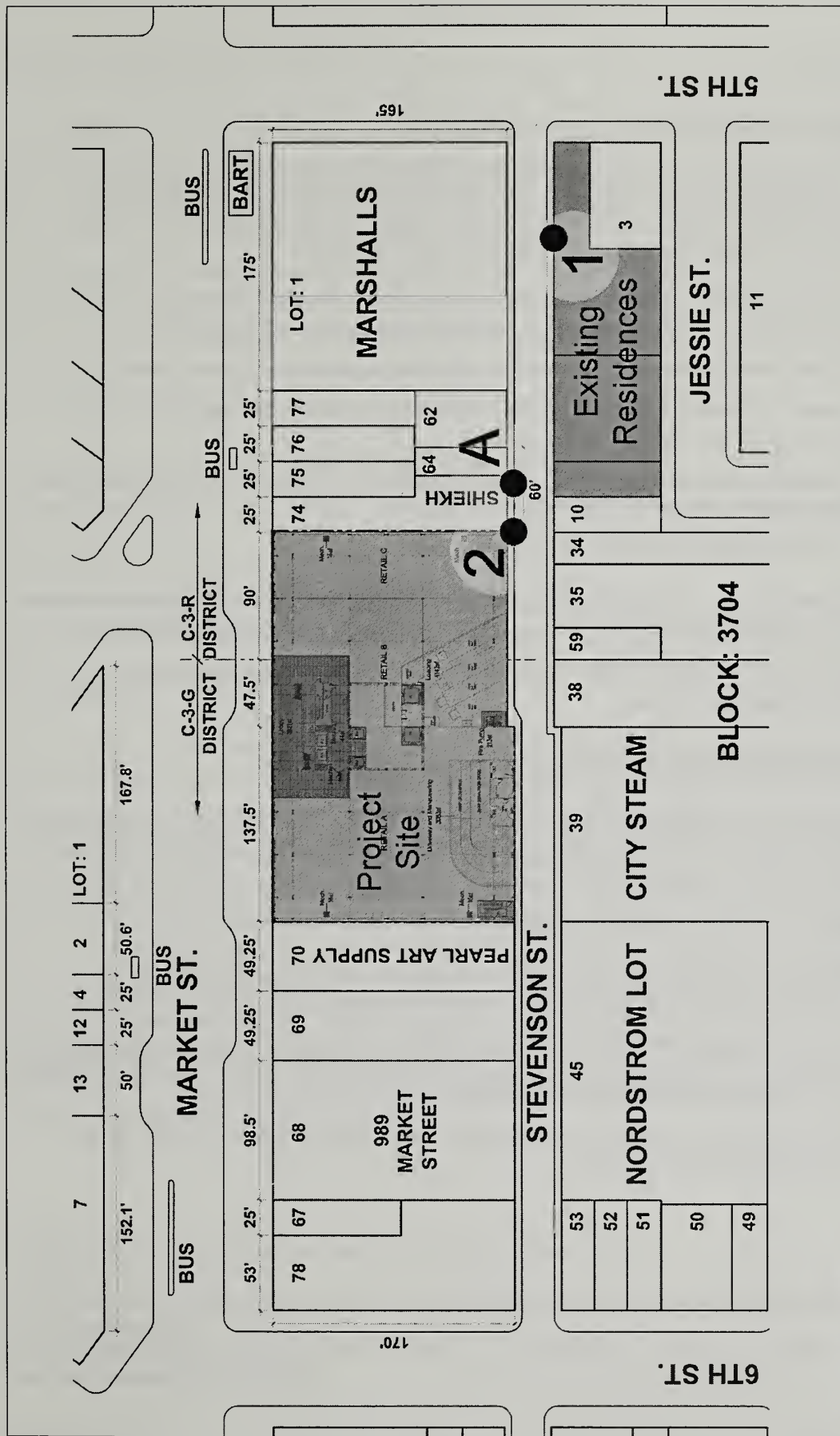
Table IV.D.1: Existing Sound Levels in the Vicinity of Proposed Project

Measurement Location Number	Description of Location	A-Weighted Sound Level, dBA				
		L_{eq}	L_{10}	L_{50}	L_{90}	L_{dn}^a
1	11 feet south of Stevenson Street centerline and 90 feet west of 5 th Street centerline	71	74	71	69	73
2	11 feet north of Stevenson Street centerline and 290 feet west of 5 th Street centerline	65	66	64	63	68

Note:

^a L_{dn} based on comparison with simultaneous measurement at long-term location (Location A on Figure IV.D.1).

Source: RGDL 2009



SOURCE: Turnstone Consulting

CITYPLACE

2005.1074E

FIGURE IV.D.1: PROJECT BOUNDARY AND NOISE MEASUREMENT LOCATIONS

IMPACTS

SIGNIFICANCE CRITERIA

The City and County of San Francisco has not formally adopted significance thresholds or standards for impacts related to noise, but generally considers that implementation of the proposed project would have a significant noise impact if it were to:

- Expose people to or generate noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies;
- Expose people to or generate excessive vibration or groundborne noise levels;
- Create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- Be substantially affected by existing noise levels.

In environmental noise, a change in noise level of 3 dB is considered a just noticeable difference. A doubling of traffic noise typically corresponds to a 3dBA increase in average noise levels. Thus, a 3dBA increase would be noticeable and is used as the quantitative criterion for establishing a significant impact.

METHODOLOGY AND ASSUMPTIONS

The major source of noise that would result from the proposed project would be noise generated by traffic attributed to the retail development. The Federal Highway Administration Traffic Noise Model (TNM 2.5) was used to calculate project-generated traffic noise. The following acoustical factors were considered in modeling the project-generated noise:

- The movements required for the trucks to maneuver into the loading dock were considered. Each truck was assumed to pass the loading dock and then reverse into it.
- Stevenson Street is quite narrow and the buildings on the north and south sides are several stories tall. Therefore, a factor to account for sound build-up due to acoustical reflections was included in the noise prediction model.
- It was assumed that each truck would idle for one minute after it had completed its maneuvers into the loading dock.

PROJECT IMPACTS

The proposed project would generate an increase in traffic on Stevenson Street from shoppers using the parking garage and from service vehicles accessing the loading dock. There would be 280 vehicle trips during the peak hour (132 inbound and 148 outbound) corresponding to approximately 3,111 vehicle trips over the course of a day.² However, only outbound vehicles would pass by the existing residences on Stevenson Street east of the project site, as Stevenson Street is a one-way street, and the two-way option would only extend from the proposed project's driveway west to Sixth Street. An estimated 58 delivery/service vehicles would access the site each day.^{3,4} Table IV.D.2 presents the distribution of delivery/service vehicles by vehicle type used by the City of San Francisco for assessing traffic impacts of retail projects.⁵

Table IV.D.2: Daily Distribution of Delivery/Service Vehicles

Service Vehicle Type	Number of Service Vehicles
Cars Pick Ups and Vans	39
Small Delivery Trucks 2 axles	5
Large Delivery Trucks 2 axles (nighttime only) ^a	11
Large Delivery Trucks 3 or more axles (nighttime only) ^a	3

Note:

^a These trucks are between 25 and 45 feet in length.

Source: RGDL 2009

According to the traffic engineer, the estimates of delivery and service vehicles should be considered conservative as there would likely be fewer large trucks because of Stevenson Street's narrow width and a proposed loading time restriction that would limit trucks larger than 30 feet to the nighttime hours between 10:00 PM and 6:00 AM (see Mitigation Measure M-TR-2 on p. IV.C.53). This mitigation measure is intended to reduce traffic impacts on Stevenson Street and would be applicable to large delivery trucks with two or more axles, as shown in Table IV.D.2. The practical effect of limiting large truck deliveries to this time period is to subject sensitive receptors such as the nearby residents on Stevenson Street to additional noise at night. Greater nighttime sensitivity of people to noise is recognized in the noise analysis, as nighttime noise-generating activities are burdened with a "penalty" of 10 dBA. The remaining delivery/service vehicles would consist of smaller trucks, vans, pick-ups, and cars that could access the loading dock throughout the day.

² AECOM, *935-965 Market Street Transportation Study*, October 2009.

³ Ibid.

⁴ The traffic analysis did not take a credit for the elimination of loading trips associated with the existing uses at the project site.

⁵ *Transportation Impact Analysis Guidelines for Environmental Review*, City and County of San Francisco Planning Department, October 2002.

Table IV.D.3 summarizes the existing, project-generated, and future noise levels at the façade of residences closest to the project site, as well as those near the intersection of Stevenson Street and Fifth Street. (See Locations 1 and 2 on Figure IV.D.1, p. IV.D.4.) As shown in Table IV.D.3, traffic from the project would generate an Ldn of up to 62 dBA, mostly due to increased nighttime truck activity since the Ldn calculation includes a “penalty” to account for a person’s increased sensitivity to noise at night. Sensitive receptors located closest to Fifth Street (Location 1), where existing loading activities for the 901 Market Street building occur, would experience an increase of less than 1 dBA Ldn, while sensitive receptors located furthest from Fifth Street and closer to the proposed loading activities would experience an increase of 1 dBA Ldn. In the future, the project-generated traffic noise would combine with the existing ambient noise and result in an Ldn of 69 to 73 dBA, which corresponds to an increase of 1 dBA or less.

**Table IV.D.3: Existing and Future Noise Levels at Residential Façades
Nearest the Project Site**

Location	L _{dn} (dBA)			
	Existing Ambient	Project Generated	Future	Increase Due to Project
1 Residential façade along Stevenson Street closest to Fifth Street	73	60	73	< 1
2 Residential façade along Stevenson Street closest to project site	68	62	69	1

Source: RGDL 2009

In conclusion, project-generated traffic would increase the L_{dn} by 1 dBA or less; this is less than the 3 dBA significance criterion. Though nighttime truck activity would increase (approximately 14 additional truck trips), the maximum noise levels from project trucks would be similar to those from existing trucks that currently deliver to the loading dock at the rear of the 901 Market Street building and use the portion of Stevenson Street directly across from the existing residences. Therefore, the increased noise due to project traffic would be a less-than-significant impact and mitigation is not necessary.

E. AIR QUALITY

This section identifies applicable air quality standards established in federal and state regulations, describes existing air quality conditions in the San Francisco Bay Area, and evaluates the potential impacts on air quality that would result from construction activities and from operational-related activities, specifically private vehicles and delivery vehicles. This section is based on the criteria air pollutant emissions and greenhouse gas (GHG) emissions calculations prepared by Donald Ballanti, Certified Consulting Meteorologist.¹ Criteria air pollutants are ozone, carbon monoxide, suspended particulates, nitrogen dioxide, and sulfur dioxide. For purposes of this analysis, GHGs are identified as carbon dioxide, methane, and nitrous oxide, together termed carbon dioxide equivalents (CO₂E). Criteria air pollutants and greenhouse gases are further discussed under “Air Quality Conditions.”

The Initial Study determined that the proposed project would not generate significant impacts with respect to odors or toxic air contaminants; thus these topics are not discussed in this section. The Initial Study also determined that implementation of Mitigation Measure AQ-1 (see Appendix A, p. 97) would reduce construction-related air quality impacts and reduce construction exhaust emissions of PM₁₀ to less-than-significant levels. However, much of Mitigation Measure AQ-1 is no longer required because the proposed project is subject to the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The Construction Dust Control Ordinance provides equivalent construction air quality protection in place of Mitigation Measure AQ-1. The intent of this ordinance, similar to Mitigation Measure AQ-1, is to reduce the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI). Since the project site is over one-half acre in size, the project sponsor would also be required to develop a Dust Control Plan for approval by the San Francisco Department of Public Health. However, due to the proximity of the proposed project to residences on Stevenson Street to the east of the project site, the measures identified in Mitigation Measure AQ-1 in the Initial Study to reduce potential impacts resulting from construction exhaust emissions of PM₁₀ would still be implemented by the project sponsor. These are identified as AQ-1a and include: the use of late-model or retrofitted equipment; the use of PuriNO_x or other fuel additives, the use of ultra-low-sulfur fuel, and /or the use of particulate traps. Implementation of Mitigation Measure AQ-1a and compliance with the ordinance would ensure that the proposed project’s temporary construction-related impacts to air

¹ Criteria air pollutant and GHG emissions calculations prepared by Donald Ballanti, Certified Consulting Meteorologist, October 26, 2009. This information is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review as part of Case File No. 2005.1074E.

quality would be reduced to less-than-significant levels, and, therefore, impacts from construction dust are not considered further in this section.

The GHG analysis in the October 2008 Notice of Preparation / Initial Study was based on the State Office of Planning and Research (OPR) proposed amendments to the *CEQA Guidelines* and OPR's Technical Advisory for addressing climate change through CEQA review. That analysis determined that the proposed project's contribution to greenhouse gas emissions would not contribute significantly to global climate change. Although the City's determination that the project's GHG emissions are less than significant has not changed from the analysis in the Initial Study, in light of new information for analyzing GHG emissions in CEQA documents, the DEIR re-addresses the proposed project's impact to emit GHG emissions. In September and October 2009, the Bay Area Air Quality Management District (BAAQMD) circulated a draft *CEQA Guidelines Update*, which proposes revised thresholds of significance for criteria air pollutants and a new quantitative threshold of significance for operational-related GHG emissions as part of the update of the 1999 BAAQMD *CEQA Guidelines*.^{2,3} The draft *CEQA Guidelines Update* would revise the quantitative threshold of significance for operational-related criteria air pollutants and set a new quantitative threshold of significance for operational-related GHG emissions. A construction-related GHG emissions threshold is not currently being proposed as part of the draft *CEQA Guidelines Update* because there is not sufficient evidence to determine a level at which construction emissions are significant. However, the BAAQMD is recommending a case-by-case consideration of construction-related GHG emissions and encourages project applicants to implement construction GHG reduction strategies where feasible. The proposed draft *CEQA Guidelines Update* also provides guidance in quantifying a project's construction- and operational-related GHG emissions. The San Francisco Planning Department has submitted formal comments on the proposed new *CEQA Guidelines Update* and has communicated that the City wishes to continue to work with the BAAQMD to refine the approach for GHG thresholds of significance to ensure consistency with OPR's proposed amendments to the *CEQA Guidelines* and consistency with the state regulatory GHG reduction planning processes of Assembly Bill 32 and Senate Bill 375.

Analysis of potential air quality impacts for the proposed project under the proposed BAAQMD *CEQA Guidelines Update* is provided on pp. IV.E.38-IV.E.45. Under the proposed guidelines, the amount of daily reactive organic gas (ROGs) emitted as a result of the proposed project would

² The BAAQMD solicited public comments on the September 2009 *California Environmental Quality Act - Draft Air Quality Guidelines* and the October 2009 *Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance*. The public comment period ended on October 26, 2009.

³ BAAQMD, *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

exceed the new proposed BAAQMD threshold of 54 pounds of ROG emissions per day. Therefore, with respect to criteria air pollutants, the project would result in a significant air quality impact with respect to construction-related emissions (see Impact AQ-2, p. IV.E.40). However, Mitigation Measure M-AQ-2 requiring the project sponsor to use low-VOC architectural coatings would reduce this impact to less than significant. With respect to operational-related GHGs, the proposed project would contribute approximately 4,364 metric tons per year of operational-related CO₂E. This is greater than the BAAQMD's proposed new significance threshold of 1,100 metric tons per year of operational-related CO₂E. As described on pp. IV.E.42-IV.E.45, all feasible BAAQMD-proposed mitigation measures are already part of the proposed project. Therefore, additional reductions afforded to the proposed project would likely have limited effectiveness in reducing operational-related GHGs below the proposed threshold of 1,100 metric tons of CO₂E/ year. For this reason, the proposed project would not be expected to be able to reduce GHG emissions to a less-than-significant level with additional mitigation measures not already incorporated into the proposed project and would result in a cumulatively considerable contribution to annual GHG emissions. Thus, the proposed project would be considered to result in a significant cumulative contribution to global climate change under the BAAQMD's proposed GHG significance threshold, Impact AQ-3. No feasible mitigation measures have been identified. Therefore, Impact AQ-3 would remain significant and unavoidable should the proposed BAAQMD *CEQA Guidelines Update* be adopted.

SETTING

CLIMATE

The City and County of San Francisco is within the San Francisco Bay Area Air Basin (SFBAAB). This area includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, the western half of Solano and the southern half of Sonoma counties. The regional climate within the Bay Area is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. A wide range of emissions sources – such as dense population centers, heavy vehicular traffic, and industry – and meteorology primarily influence the air quality within the Bay Area.

AIR QUALITY CONDITIONS

Criteria Air Pollutants

The BAAQMD's air quality monitoring network provides information on ambient concentrations of criteria air pollutants in San Francisco. Table IV.E.1 is a four-year summary (2004 to 2007) of the highest annual criteria air pollutant concentrations, collected at the BAAQMD's air quality

monitoring station on Arkansas Street in the Potrero Hill neighborhood of San Francisco, approximately one mile south of the project site, and at 939 Ellis Street station near Civic Center, approximately one-half mile west of the project site (for carbon monoxide only). Table IV.E.1 compares measured pollutant concentrations with the most stringent applicable ambient air quality standards (state or federal).

Table IV.E.1: Summary of San Francisco Air Quality Monitoring Data (2004-2007)

Pollutant	Most Stringent Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured			
		2004	2005	2006	2007
Ozone (ROG)					
- Days 1-hour Std. Exceeded	>9 pphm ^a	0	0	0	0
- Max. 1-hour Conc. (pphm) ^b		9	5.8	5.3	6
- Days 8-hour Std. Exceeded	>8 pphm ^b	0	0	0	0
- Max. 8-hour Conc. (pphm) ^b		6	5.4	4.5	4.9
Carbon Monoxide (CO)					
- Days 1-hour Std. Exceeded	>20 ppm ^a	0	0	0	0
- Max. 1-hour Conc. (ppm)		2.9	2.5	2.7	2.5
- Days 8-hour Std. Exceeded	>9 ppm ^a	0	0	0	0
- Max. 8-hour Conc. (ppm)		2.2	2.1	2.1	1.6
Suspended Particulates (PM ₁₀)					
- Days 24-hour Std. Exceeded ^c	>50 µg/m ³ ^a	1	0	3	2
- Max. 24-hour Conc. (µg/m ³)		52	46	61	70
Suspended Particulates (PM _{2.5})					
- Days 24-hour Std. Exceeded	>35 µg/m ³ ^{b,d}	0	0	3	5
- Max. 24-hour Conc. (µg/m ³)		46	43.6	54.3	45.2
- Annual Average (µg/m ³)	>12 µg/m ³ ^a	9.9	9.5	9.7	8.7
Nitrogen Dioxide (NO ₂)					
- Days 1-hour Std. Exceeded	>0.25 ppm ^a	0	0	0	0
- Max. 1-hour Conc. (pphm) ^b		6	6	7	6
Sulfur Dioxide (SO ₂)					
- Days 24-hour Std. Exceeded	>40 ppb ^a	0	0	0	0
- Max. 24-hour Conc. (ppb) ^b		8	7	6	6

Notes: **Bold** values are in excess of applicable standard. "NA" indicates that data is not available.

conc. = concentration; ppm = parts per million; pphm = parts per hundred million; ppb=parts per billion; µg/m³ = micrograms per cubic meter

^a State standard, not to be exceeded.

^b Federal standard, not to be exceeded.

^c Based on a sampling schedule of one out of every six days, for a total of approximately 60 samples per year.

^d In December 2006 the U.S. EPA implemented a more stringent PM_{2.5} standard, changing it from 65 to 35 µg/m³. The number of days exceeded reflects this new standard for 2006 and 2007, and reflects the older applicable standard for 2004 and 2005.

Source: BAAQMD 2004-2007

Ozone (O₃)

Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x). The main sources of NO_x and ROG, often referred to as ozone precursors, are combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and fuels. In the Bay Area, automobiles are the single largest source of ozone precursors. In the San Joaquin Valley, primary sources of ozone precursors are mobile sources, solvents, farming operations, area sources (e.g., consumer products, fuel combustion, landscape maintenance equipment, etc.), and oil/gas production.

Ozone is a regional air pollutant because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema. Table IV.E.1 shows that, according to published data, the most stringent applicable standards (state 1-hour standard of 9 parts per hundred million [pphm] and the federal 8-hour standard of 8 pphm) were not exceeded in San Francisco between 2004 and 2007.

Carbon Monoxide (CO)

CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause dizziness and fatigue, impair central nervous system function, and induce angina in persons with serious heart disease. As shown in Table IV.E.1, no exceedances of state CO standards were recorded between 2004 and 2007. Measurements of CO indicate hourly maximums ranging between 15 to 25 percent of the more stringent state standard, and maximum 8-hour CO levels approximately 30 percent of the allowable 8-hour standard.

Suspended Particulates (PM₁₀ and PM_{2.5})

Particulate matter is a class of air pollutants that consists of solid and liquid airborne particles in an extremely small size range. Particulate matter is measured in two size ranges: PM₁₀ for particles less than 10 microns in diameter, and PM_{2.5} for particles less than 2.5 microns in diameter. In the Bay Area, motor vehicles generate about half of the air basin's particulates, through tailpipe emissions as well as brake pad and tire wear. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of fine particulates. Fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. Among the criteria pollutants that are

regulated, particulates appear to represent the most serious overall health hazard. Studies have shown that elevated particulate levels contribute to the death of approximately 200 to 500 people per year in the Bay Area. High levels of particulates have also been known to exacerbate chronic respiratory ailments, such as bronchitis and asthma, and have been associated with increased emergency room visits and hospital admissions.

Diesel exhaust is a growing concern throughout California. The CARB has identified diesel engine particulate matter as a toxic air contaminant. The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Many of these toxic compounds adhere to the diesel particles, which are very small and can penetrate deeply into the lungs. Diesel engine particulate matter has been identified as a human carcinogen. Mobile sources such as trucks, buses, and automobiles are some of the primary sources of diesel emissions. Studies show that diesel particulate matter concentrations are much higher near heavily traveled highways and intersections. The cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other toxic air pollutant routinely measured in the region. Diesel exhaust contains both pulmonary irritants and hazardous compounds that could affect sensitive receptors such as young children, senior citizens, or those susceptible to chronic respiratory disease such as asthma, bronchitis, and emphysema.

In 2001, the California Health Interview Survey (CHIS) found that California's lifetime asthma prevalence, at 11.5 percent of the population, is higher than the national lifetime asthma prevalence of 10.1 percent.⁴ When asthma symptom prevalence in 2001 is sorted by county, the CHIS found that people who live in rural areas have more frequent asthma symptoms. Asthma symptom prevalence by region ranged from 10.4 to 13.8 percent for all ages. The highest rates occurred in Northern California, Sierra, and Sacramento area counties (13.8 percent). The San Joaquin region had a rate of 12.9 percent, while the Bay Area region had a rate of 12.2 percent. These data indicate that asthma is a regional (not localized) problem. However, these regional statistics mask the fact that asthma rates are higher among African-Americans (16.2 percent) than among the rest of the population (7.0 to 13.1 percent), suggesting there may be asthma "hot spots" in some communities that are not well characterized by regional averages.

Table IV.E.1 also shows that exceedances of the state PM_{10} standard have occurred in San Francisco. It is estimated that the state 24-hour PM_{10} standard was exceeded between one and three days per year between 2004 and 2007.

⁴ Meng, Ying-Ying, R.P. Rull, M. Wilhelm, B. Ritz, P. English, H. Yu, S. Nathan, M. Kuruvilla, E. Brown, *UCLA Center for Health Policy Research Brief, Living Near Heavy Traffic Increases Asthma Severity*. August 2006. "Lifetime asthma prevalence" includes people diagnosed with asthma at some point in their lives, while "asthma symptom prevalence" includes those who experience asthma symptoms at least once per year.

The BAAQMD began monitoring PM_{2.5} concentrations in San Francisco in 2002. The federal 24-hour PM_{2.5} standard was not exceeded in 2004 and 2005, but was exceeded in 2006 and 2007. The state annual average standard was not exceeded between 2004 and 2007.

Nitrogen Dioxide (NO₂)

NO₂ is a reddish brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Aside from its contribution to ozone formation, NO₂ can increase the risk of acute and chronic respiratory disease and reduce visibility. NO₂ may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. Table IV.E.1 shows that the standard for NO₂ is being met in the Bay Area, and pollutant trends suggest that the air basin will continue to meet these standards for the foreseeable future.

Sulfur Dioxide (SO₂)

SO₂ is a colorless acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO₂ has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease.⁵ Table IV.E.1 shows that the standard for SO₂ is being met in the Bay Area, and pollutant trends suggest that the air basin will continue to meet these standards for the foreseeable future.

Greenhouse Gases and Global Climate Change

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected from earth back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as a driving force for global climate change. Definitions of climate change vary among and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth's climate caused by natural fluctuations and anthropogenic activities which alter the composition of the global atmosphere.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction and operational phases. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. (Ozone—not directly emitted, but formed from other gases—in the troposphere, the lowest level of the earth's atmosphere, also contributes to the retention of heat.) While the primary GHGs in the atmosphere are naturally occurring, carbon

⁵ BAAQMD, *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide-equivalent" measures. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs, with much greater heat-absorption potential than carbon dioxide, include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming, although there is uncertainty concerning the magnitude and rate of the warming. This analysis considers three primary GHGs that would be emitted during land use development projects: CO₂, CH₄, and N₂O. These GHGs are discussed further below.

Carbon dioxide (CO₂)

Carbon dioxide is an odorless, colorless gas, which has both natural and anthropogenic (arising from human activities) sources. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources of carbon dioxide are from burning coal, oil, natural gas, and wood. Concentrations of carbon dioxide were 379 parts per million (ppm) in 2005, which equates to an increase of 1.4 ppm per year since 1960.⁶ CO₂ is the most common greenhouse gas generated by California activities, constituting approximately 84 percent of all greenhouse gas emissions.⁷ CO₂ emissions attributed to California activities are mainly associated with in-state fossil fuel combustion and fossil fuel combustion in out-of-state power plants supplying electricity to California. Other activities that produce CO₂ emissions include mineral production, waste combustion, and land use changes that reduce vegetation.

Methane (CH₄)

Methane is a flammable gas and is the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. A natural source of methane is from the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are landfills, fermentation of manure, and cattle.

⁶ IPCC, 2007. R.B. Alley et al. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Summary for Policymakers.

⁷ CEC, 2007. Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004.

Nitrous Oxide (N₂O)

Nitrous oxide is naturally produced by microbial processes in soil and water. Anthropogenic sources of nitrous oxide include agricultural sources, industrial processing, fossil fuel-fired power plants, and vehicle emissions. Nitrous oxide also is used as an aerosol spray propellant and in medical applications.

A summary report from the California Climate Change Center highlights the potential changes to the environment that a warming California climate would generate. Among them are more smoggy days through contribution to ozone formation while also fostering conditions that could allow more large brush and forest fires. These fires would, in turn, release sequestered CO₂, and create the potential for mudslides, thereby affecting the levels of particulate matter in regional air basins. The summary report acknowledges that business-as-usual increases in global GHG emissions would result, by late in the century, in the loss of 90 percent of California's Sierra snowpack, sea level rising by more than 20 inches, and a three to four times increase in the number of heat wave days. Increase in global temperatures and the rising number of heat wave days would result in elevated concentrations and emissions of harmful pollutants. These impacts will translate into additional environmental and public health costs as well as increased expenditures for emergencies such as forest fires or floods. Secondary effects are likely to include impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.⁸

The California Energy Commission (CEC) estimated that in 2006 California produced about 480-million gross metric tons (about 530-million U.S. tons) of carbon dioxide-equivalent GHG emissions.^{9,10} The CEC found that transportation is the source of about 40 percent of California's GHG emissions, followed by electricity generation (both in-state and out-of-state) at about 23 percent and industrial sources at about 20 percent. In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, locomotives, ships and boats, off-road equipment, and aircraft) is the single largest source of the Bay Area's GHG emissions, accounting for approximately 44 percent of the Bay Area's 102.6 million metric tons of greenhouse gas emissions in 2007. Industrial and commercial sources were the second largest contributors of GHG emissions with about 34 percent of total emissions. Energy production activities such as

⁸ California Climate Change Center. *Our Changing Climate: Assessing the Risks to California*. Document No. CEC-500-2006-077, July 2006. Available at <http://www.energy.ca.gov/2006publications/CEC-500-2006-077/CEC-500-2006-077.PDF>. Accessed October 16, 2009.

⁹ California Energy Commission, *Greenhouse Gas Inventory Data – 2000-2006*, May 22, 2009. Available at: <http://www.arb.ca.gov/cc/inventory/data/data.htm>. Accessed on October 16, 2009.

¹⁰ Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

electricity generation and co-generation, including imported electricity emissions, account for about 15 percent of the Bay Area's GHG emissions, followed by domestic consumption, i.e. residential fuel usage, at approximately 7 percent. Agriculture and farming currently accounts for about one percent of the total Bay Area GHG emissions.¹¹

APPLICABLE CRITERIA AIR POLLUTANT REGULATIONS

Both the federal and state governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health. The national and state ambient air quality standards have been set at levels where concentrations could be generally harmful to human health and welfare, and to protect the most sensitive persons from illness or discomfort with a margin of safety. The air pollutants for which national and state standards have been promulgated and which are most relevant to air quality planning and regulation in the Bay Area include ozone, carbon monoxide (CO), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and sulfur dioxide (SO₂). These pollutants were discussed above under "Air Quality Conditions".

FEDERAL

National Ambient Air Quality Standards

The 1970 Clean Air Act (last amended in 1990, 42 United States Code [USC] 7401 et seq.) required that regional planning and air pollution control agencies prepare a regional air quality plan to outline the measures by which both stationary and mobile sources of pollutants will be controlled in order to achieve all standards by the deadlines specified in the Clean Air Act. The ambient air quality standards are intended to protect the public health and welfare, and they specify the concentration of pollutants (with an adequate margin of safety) to which the public can be exposed without adverse health effects. They are designed to protect those segments of the public most susceptible to respiratory distress, known as sensitive receptors, including asthmatics, the very young, the elderly, people weak from other illness or disease, or persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollution levels that are somewhat above the ambient air quality standards before adverse health effects are observed.

¹¹ BAAQMD, *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007*, December 2008. Available at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/Emission-Inventory-and-Air-Quality-Related/Emission-Inventory/~media/64A8751292F44BEEAD56B7569B68DB27.ashx>. Accessed October 16, 2009.

The national standards are summarized in Table IV.E.2. In general, the SFBAAB experiences low concentrations of most pollutants when compared to national standards, except for ozone (O_3) and fine particulate matter ($PM_{2.5}$), for which standards are exceeded periodically. The SFBAAB's attainment status for ozone has changed several times over the past decade, first from "nonattainment" to "attainment" in 1995, then back to "unclassified nonattainment" in 1998 for the 1-hour federal ozone standard. In June 2004, the SFBAAB was designated as "marginal nonattainment" for the 8-hour ozone standard. In June 2005, the U.S. Environmental Protection Agency (U.S. EPA) revoked the federal 1-hour ozone standard, although the 8-hour standard is still in effect and the Bay Area remains a nonattainment area. In 1998, after many years without violations of any CO standards, the attainment status for CO was upgraded to "attainment."

STATE

California Ambient Air Quality Standards

The Clean Air Act Amendments of 1970 established national ambient air quality standards, and individual states retained the option to adopt more stringent standards and to include other pollution sources. California had already established its own air quality standards when federal standards were established, and because of the unique meteorological problems in California, there is considerable diversity between the state and national ambient air quality standards, as shown in Table IV.E.2. California ambient air quality standards tend to be at least as protective as national ambient standards and are often more stringent.

In 1988, California passed the California Clean Air Act (California Health and Safety Code Sections 39600 et seq.), which, like its federal counterpart, called for the designation of areas as attainment or nonattainment, but based on state ambient air quality standards rather than the federal standards. Table IV.E.2 presents a summary of the SFBAAB's current attainment status with respect to state standards. As indicated in the table, the SFBAAB is designated as "nonattainment" for state ozone, PM_{10} and $PM_{2.5}$ standards. The SFBAAB is designated as "attainment" for all other pollutants listed in the table.

California Air Resources Board

The California Air Resources Board (CARB) is the state agency responsible for regulating air quality. The CARB's responsibilities include establishing state ambient air quality standards, emissions standards, and regulations for mobile emissions sources (e.g., autos, trucks, etc.), as well as overseeing the efforts of countywide and multi-county air pollution control districts, which have primary responsibility over stationary sources.

Table IV.E.2: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	(State) CAAQS ^(a)		(Federal) NAAQS ^(b)	
		Standard	Attainment Status	Standard	Attainment Status
Ozone (O ₃)	1 hour	0.09 ppm	N	NA	See Note ^(c)
	8 hour	0.07 ppm ^(d)	N	0.075 ppm ^(e)	N
Carbon Monoxide (CO)	1 hour	20 ppm	A	35 ppm	A
	8 hour	9 ppm	A	9 ppm	A
Nitrogen Dioxide (NO ₂)	1 hour	0.18 ppm	A	NA	NA
	Annual	0.030	NA	0.053 ppm	A
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	A	NA	NA
	24 hour	0.04 ppm	A	0.14 ppm	A
	Annual	NA	NA	0.03 ppm	A
Respirable Particulate Matter (PM ₁₀)	24 hour	50 µg/m ³	N	150 µg/m ³	U
	Annual ^(f)	20 µg/m ³ ⁽⁷⁾	N	NA	NA
Fine Particulate Matter (PM _{2.5})	24 hour ^(g)	NA	NA	35 µg/m ³	N
	Annual	12 µg/m ³	N	15 µg/m ³	A
Sulfates	24 hour	25 µg/m ³	A	NA	NA
Lead	30 day	1.5 µg/m ³	A	NA	NA
	Cal. Quarter	NA	NA	1.5 µg/m ³	A
Hydrogen Sulfide	1 hour	0.03 ppm	U	NA	NA
Visibility-Reducing Particles	8 hour	See Note ^(h)	U	NA	NA

Notes: A = Attainment; N = Nonattainment; U = Unclassified; NA = Not Applicable, no applicable standard; ppm = parts per million; µg/m³ = micrograms per cubic meter.

^a CAAQS = state ambient air quality standards (California). CAAQS for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.

^b NAAQS = national ambient air quality standards. NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The 8-hour ozone standard is attained when the three-year average of the fourth highest daily concentration is 0.08 ppm or less. The 24-hour PM₁₀ standard is attained when the three-year average of the 99th percentile of monitored concentrations is less than the standard. The 24-hour PM_{2.5} standard is attained when the three-year average of the 98th percentile is less than the standard.

^c The U.S. EPA revoked the national 1-hour ozone standard on June 15, 2005.

^d This state 8-hour ozone standard was approved in April 2005 and became effective in May 2006.

^e In May 2008, the U.S. EPA implemented a more stringent national 8-hour ozone standard of 0.75 ppm.

^f State standard = annual geometric mean.

^g In June 2002, the California Air Resources Board established new annual standards for PM_{2.5} and PM₁₀. In December 2006, the U.S. EPA implemented a more stringent 24-hour standard for PM_{2.5} of 35 µg/m³.

^h Statewide visibility-reducing particle standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Source: BAAQMD 2009

REGIONAL/LOCAL

Bay Area Air Quality Management District

The BAAQMD is the regional agency responsible for air quality regulation within the SFBAAB. The BAAQMD regulates air quality through its planning and review activities. The BAAQMD has permit authority over most types of stationary emission sources and can require stationary sources to obtain permits; it can also impose emission limits, set fuel or material specifications, or establish operational limits to reduce air emissions.

The BAAQMD's *Clean Air Plan* (CAP), last adopted in 2000, applies control measures to stationary and mobile sources and outlines transportation control measures. Although the 2000 CAP is an ozone plan, it includes PM₁₀ attainment planning as an informational item. The 2000 CAP continues to implement and expand key mobile-source programs included in the 1997 CAP, including 19 transportation control measures.

In response to the U.S. EPA redesignation of the basin for the 1-hour federal ozone standard to nonattainment, the BAAQMD, Association of Bay Area Governments (ABAG), and Metropolitan Transportation Commission (MTC) were required to develop an ozone attainment plan to meet this standard. The *1999 Ozone Attainment Plan* (OAP) was prepared and adopted by these agencies in June 1999. However, in March 2001, the U.S. EPA proposed and took final action to approve portions of the 1999 OAP and disapprove other portions, while also making the finding that the Bay Area had not attained the national 1-hour ozone standard. As a result, a revised OAP was prepared and adopted in October 2001. The 2001 OAP amends and supplements the 1999 OAP. The 2001 OAP contains control strategies for stationary and mobile sources. The adopted mobile-source control program was estimated to significantly reduce volatile organic compounds and nitrogen oxide (NO_x) emissions between 2000 and 2006, reducing emissions from on- and off-road diesel engines (including construction equipment). In addition to emission reduction requirements for engines and fuels, the OAP identified 28 transportation control measures to reduce automobile emissions, including improved transit service and transit coordination, new carpool lanes, signal timing, freeway incident management, and increased state gas tax and bridge tolls.

In January 2006, the BAAQMD, in cooperation with the MTC and ABAG, adopted the *Bay Area 2005 Ozone Strategy*. The *Ozone Strategy* is a roadmap showing how the San Francisco Bay Area will achieve compliance with the state 1-hour ozone standard as expeditiously as practicable, and how the region will reduce transport of ozone and ozone precursors to neighboring air basins. The control strategy includes stationary-source control measures to be implemented through BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be

implemented through transportation programs in cooperation with the MTC, local governments, transit agencies, and others.

City of San Francisco

San Francisco has a history of environmental protection policies and programs aimed at improving the quality of life for San Francisco's residents and reducing impacts on the environment. The following plans, policies and legislation demonstrate San Francisco's continued commitment to environmental protection.

The *San Francisco General Plan (General Plan)* includes the 1997 Air Quality Element.¹² The objectives specified by the City include the following:

- Objective 1:** Adhere to State and federal air quality standards and regional programs.
- Objective 2:** Reduce mobile sources of air pollution through implementation of the Transportation Element of the *General Plan*.
- Objective 3:** Decrease the air quality impacts of development by coordination of land use and transportation decisions.
- Objective 5:** Minimize particulate matter emissions from road and construction sites.
- Objective 6:** Link the positive effects of energy conservation and waste management to emission reductions.

San Francisco Construction Dust Control Ordinance. The Dust Control Ordinance was adopted in July 2008 and requires that all site preparation work, demolition, or other construction activities within the City and County of San Francisco comply with specific dust control measures. For projects over one-half acre, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Health Department prior to issuance of a building permit by Department of Building Inspection (DBI). Building permits will not be issued without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the Director waives the requirement. The Construction Dust Control Ordinance requires project sponsors and contractors responsible for construction activities to control construction dust on the site or implement other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco *Public Works Code*.

¹² City and County of San Francisco, Planning Department, Air Quality, An Element of the *General Plan* of the City and County of San Francisco, July 1997, updated in 2000.

Since the project site is over one-half acre in size, the project sponsor would be required to develop a Dust Control Plan for approval by the San Francisco Department of Public Health. The project sponsor would also be required to designate an individual to monitor compliance with dust control requirements. Site-specific Dust Control Plans require the project sponsor to: submit a map to the Director of Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mile per hour speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions.

APPLICABLE GREENHOUSE GAS REGULATIONS

Climate change has only recently been widely recognized as a threat to the global climate, economy, and population. As a result, the climate change regulatory setting—federal, state, and local—is complex and evolving. This section identifies key legislation, executive orders, and seminal court cases related to climate change germane to project-generated GHG emissions.

FEDERAL

Currently, there is no federal legislation requiring reductions in GHG emissions. Rather, the U.S. EPA administers a variety of voluntary programs and partnerships with GHG emitters in which the U.S. EPA partners with industries producing and utilizing synthetic GHGs to reduce emissions of these particularly potent GHGs. There are federal actions requiring increasing automobile efficiency, an endangerment finding for CO₂, and a recently finalized regulation requiring large sources of GHG emissions to report their emission to the U.S. EPA. In addition, there are several bills pending in Congress that are attempting to regulate GHG emissions in the United States; most of these bills require a cap and trade program where GHG emissions will be reduced overall through a market-driven approach.

April 2007 Supreme Court Ruling

In *Massachusetts et al. vs. Environmental Protection Agency et al.* (April 2, 2007) the US Supreme Court ruled that the *Clean Air Act* (CAA) authorizes the U.S. EPA to regulate CO₂ emissions from new motor vehicles. The Court did not mandate that the U.S. EPA enact regulations to reduce GHG emissions, but found that the only instances where the U.S. EPA could avoid taking action if it were found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change. On April 24, 2009 the U.S. EPA issued a proposed endangerment finding, stating that high atmospheric levels of greenhouse gases “are the unambiguous result of human emissions, and are very likely the cause of the observed increase in average temperatures and other climatic changes.” The U.S. EPA further found that “atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the CAA.” The finding itself does not impose any requirements on industry or other entities. The public comment period for this proposed endangerment finding ended June 23, 2009 and the finding is now under final review.¹³

Corporate Average Fuel Efficiency Standards

In response to the *Massachusetts et al. vs. Environmental Protection Agency et al.* ruling, the Bush Administration issued an executive order on May 14, 2007, directing the U.S. EPA and Departments of Transportation (DOT) and Energy (DOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. On December 19, 2007, the *Energy Independence and Security Act of 2007* (EISA) (discussed below) was signed into law, which requires an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020. EISA requires establishment of interim standards (from 2011 to 2020) that will be the “maximum feasible average fuel economy” for each fleet. On October 10, 2008, the National Highway Traffic Safety Administration (NHTSA) released a final environmental impact statement analyzing proposed interim standards for model years 2011 to 2015 passenger cars and light trucks. NHTSA issued a final rule for model year 2011 on March 23, 2009.¹⁴

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the US auto industry. The proposed rulemaking is a collaborative effort between the DOT and U.S. EPA with the support of the United Auto Workers. The proposed federal

¹³ Available at <http://www.epa.gov/climatechange/endangerment.html>. Accessed October 29, 2009.

¹⁴ Available at <http://www.nhtsa.dot.gov/portal/site/nhtsa/menuitem.43ac99aefa80569eea57529cdba046a0/>. Accessed October 29, 2009.

standards apply to passenger cars, light-duty trucks, and medium duty passenger vehicles built in model years 2012 through 2016. If finalized, the proposed rule would surpass the 2007 CAFE standards and require an average fuel economy standard of 35.5 mpg in 2016. On May 22, 2009, the DOT and U.S. EPA issued a notice of upcoming joint rulemaking on this issue.^{15,16} A Draft Environmental Impact Statement has been issued and the comment period for this ends on November 9, 2009. On June 30, 2009 the U.S. EPA granted the waiver for California for its greenhouse gas emission standards for motor vehicles; this is described in more detail below.

Energy Independence and Security Act of 2007

In addition to setting increased CAFE standards for motor vehicles, the EISA includes other provisions: (1) Renewable Fuel Standard (RFS) (Section 202), (2) Appliance and Lighting Efficiency Standards (Section 301-325) and; Building Energy Efficiency (Sections 411-441). Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”

Consolidated Appropriations Act of 2008 (HR 2764)

Congress passed the *Consolidated Appropriations Act of 2008* (HR 2764) in December 2007, which includes provisions requiring the establishment of mandatory GHG reporting requirements. The measure directed U.S. EPA to publish draft rules by September 2008, and final rules by June 2009 mandating reporting “for all sectors of the economy.” The U.S. EPA finalized GHG reporting rules on September 22, 2009. The GHG reporting rule requires reporting of GHG emissions from facilities that emit 25,000 metric tonnes or more per year of GHG emissions and these sources are required to submit annual reports to EPA.

Congressional Bills

There are several pieces of proposed legislation in both the United States Senate and House of Representatives. While these pieces are not yet final enacted regulations, they are key pieces that could have an impact on GHG emission reductions. The *American Clean Energy and Security Act of 2009*, known as the Waxman-Markey Bill is an energy bill that would establish a cap-and-trade plan for GHG emission reductions of 17 percent by 2020 to address climate change and

¹⁵ Available at <http://yosemite.epa.gov/opa/admpress.nsf/6fa790d452bcd7f58525750100565efa/451902cb77d4add5852575bb006d3f9b>. Accessed October 29, 2009.

¹⁶ Available at <http://www.nhtsa.dot.gov/portal/site/nhtsa/menuitem.43ac99aefa80569eea57529cdba046a0/>. Accessed October 29, 2009.

80 percent reduction by 2050. It also includes a 20 percent renewable energy source and efficiency requirement for utilities by 2020. This bill was passed by the House of Representatives on June 26, 2009. The bill needs to be voted on in the Senate.

The Senate is working on a companion bill, which was referred to the Senate Environment and Public Works committee for consideration. This bill is the *Clean Energy Jobs and American Power Act* known as the Kerry-Boxer bill. This bill calls for a 20 percent reduction in GHG emissions by 2020 and greater than 80 percent reductions by 2050. This is higher than the Waxman-Markey bill passed in the House of Representatives.

STATE

California has enacted a variety of legislation that relates to climate change, much of which sets aggressive goals for GHG reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in environmental review documents prepared under CEQA. As discussed below, the Office of Planning and Research (OPR) has been directed to develop CEQA Guidelines for the mitigation of GHG emissions and their effects; CARB must adopt regulations by January 1, 2010. OPR recently released a guidance document, discussed below, for analyzing GHG emissions under CEQA, but this document is purely advisory and serves as guidance only. On January 8, 2009, OPR released *Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions*. These amendments propose specific guidelines to public agencies for addressing GHG emissions as part of the general CEQA requirements to determine a project's effects on the environment. On April 13, 2009, OPR submitted proposed amendments to the CEQA Guidelines for greenhouse gas emissions to the Secretary for Natural Resources.^{17,18,19} On July 3, 2009, the California Natural Resources Agency (CNRA) commenced the *Administrative Procedure Act* rulemaking process for certifying and adopting these amendments. Public comments were accepted through August 20, 2009.

No relevant local, state, or regional agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents for commercial developments. The discussion below provides a brief overview of the CARB and OPR documents and of the primary legislation that relates to climate change, which may affect the emissions associated with the proposed project.

¹⁷ Available at <http://opr.ca.gov/index.php?a=ccqa/index.html>. Accessed October 29, 2009.

¹⁸ Available at <http://ceres.ca.gov/ccqa/guidelines/>. Accessed October 29, 2009.

¹⁹ Available at <http://www.arb.ca.gov/cc/localgov/ccqa/ccqa.htm>. Accessed October 29, 2009.

California Global Warming Solutions Act of 2006 (Assembly Bill 32)

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the CARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

AB 32 establishes a timetable for the CARB to adopt emission limits, rules, and regulations designed to achieve the intent of the Act. CARB staff prepared a scoping plan to meet the 2020 greenhouse gas reduction limits outlined in AB 32. In order to meet these goals, California must reduce its GHGs by at least 30 percent below projected 2020 business-as-usual emissions levels, or about 15 percent from today's levels. In December 2008, CARB released its *Climate Change Scoping Plan*, which estimates a reduction of 174 million metric tons of CO₂E (carbon dioxide equivalents). Approximately one-third of the emissions reductions strategies fall within the transportation sector and include the following: California Light-Duty Vehicle GHG Standards, Low Carbon Fuel Standard, Vehicle Efficiency Measures, Goods Movement, Medium/Heavy-Duty Vehicles, and High Speed Rail.²⁰ These measures are expected to reduce GHG emissions by 57.3 MMTCO₂E. Emissions from the electricity sector are expected to reduce another 49.7 MMTCO₂E. Reductions from the electricity sector include building and appliance energy efficiency and conservation, increased combined heat and power, solar water heating (AB 1470), the renewable energy portfolio standard (33 percent renewable energy by 2020), and the existing million solar roofs program. Other reductions are expected from industrial sources, agriculture, forestry, recycling and waste, water, and emissions reductions from cap-and-trade programs. Local government actions and regional transportation-related GHG targets are also expected to yield a reduction of 5 MMTCO₂E.²¹ Measures that could become effective during implementation pertain to construction-related equipment and building and appliance energy efficiency. Some proposed measures will require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act (NEPA).

Applicable measures that are ultimately adopted will become effective during implementation of the proposed project and the proposed project could be subject to these requirements, depending on the proposed project's timeline. Key AB 32 milestones include:

June 30, 2007 – Identification of discrete early action greenhouse gas emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early

²⁰ California Air Resources Board, *Climate Change Scoping Plan*, December 2008, p. 17.

²¹ Ibid.

action measures. These were later supplemented by adding six other discrete early action measures.

January 1, 2008 – Identification of the 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level. Adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.

January 1, 2009 – Adoption of a scoping plan for achieving GHG emission reductions. On October 15, 2008, CARB issued a “discussion draft” Scoping Plan entitled “Climate Change Draft Scoping Plan: A Framework for Change” (Draft Scoping Plan). CARB adopted the Draft Scoping Plan at its December 11, 2008 meeting.

January 1, 2010 – Adoption and enforcement of regulations to implement the “discrete” actions.

January 1, 2011 – Adoption of GHG emissions limits and reduction measures by regulation.

January 1, 2012 – GHG emissions limits and reduction measures adopted in 2011 become enforceable.

Executive Order S-3-05 (Statewide GHG Targets)

California Executive Order S-03-05 (June 1, 2005) mandates a reduction of GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

Although the 2020 target is the core of AB 32, and has effectively been incorporated into AB 32, the 2050 target remains the goal of the Executive Order.

Low Carbon Fuel Standard (LCFS)

Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.²²

Senate Bill 1368 (GHG Emissions Standard for Baseload Generation)

Senate Bill (SB) 1368 prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant. This performance standard applies to electricity generated out of state as well as in state, and to publicly owned as well as investor-owned electric utilities.

²² Available at <http://www.arb.ca.gov/fuels/lcfs/lcfs.htm>. Accessed October 29, 2009

Assembly Bill 1493 (Mobile Source Reductions)

AB 1493 requires CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from noncommercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. The bill requires the California Climate Action Registry (CCAR) to develop and adopt protocols for the reporting and certification of greenhouse gas emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorizes CARB to grant emission reduction credits for reductions of greenhouse gas emissions prior to the date of enforcement of regulations, using model year 2000 as the baseline for reduction.

In 2004, CARB applied to the U.S. EPA for a waiver under the federal CAA to authorize implementation of these regulations. The waiver request was formally denied by the U.S. EPA in December 2007 after California filed suit to prompt federal action. In January 2008 the State Attorney General filed a new lawsuit against the U.S. EPA for denying California's request for a waiver to regulate and limit GHG emissions from these automobiles. In January 2009, President Barack Obama issued a directive to the U.S. EPA to reconsider California's request for a waiver. On June 30, 2009 the U.S. EPA granted the waiver for California for its greenhouse gas emission standards for motor vehicles. As part of this waiver, U.S. EPA specified the following provision: CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. California has agreed to cooperate with the federal CAFE and GHG emission reductions in order for there to be one national standard.

Senate Bills 1078 and 107 (Renewable Portfolio Standard)

Established in 2002 under SB 1078 and accelerated in 2006 under SB 107, California's Renewable Portfolio Standard (RPS) requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

Executive Order S-14-08 and S-21-09 (Renewable Portfolio Standard)

California Executive Order S-14-08 (November 11, 2008) mandates retail suppliers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020. This has been reiterated by California Executive Order S-21-09 which charges CARB by July 31, 2010 to establish a regulation consistent with this 33 percent target by 2020. This is a further increase in RPS over SB 1078 and SB 107.

Senate Bill 375 (Land Use Planning)

SB 375 provides for a new planning process to coordinate land use planning and regional transportation plans and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs) relevant to the Project area (including the Metropolitan Transportation Commission (MTC)), to incorporate a “sustainable communities strategy” in their regional transportation plans (RTPs) that will achieve GHG emission reduction targets set by CARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 will be implemented over the next several years.

SB 375 is similar to the Regional Blueprint Planning Program, established by the California Department of Transportation, which provides discretionary grants to fund regional transportation and land use plans voluntarily developed by MPOs working in cooperation with Councils of Government. MTC’s 2013 RTP will be its first plan subject to SB 375. The Scoping Plan adopted by CARB in December of 2008 relies on the requirements of SB 375 to implement the carbon emission reductions anticipated from land use decisions. The Regional Targets Advisory Committee (RTAC) established by SB 375 recently provided its recommendations to CARB.

Energy Conservation Standards

Energy Conservation Standards for new residential and non-residential buildings were first adopted by California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2008 (Title 24, Part 6 of the *California Code of Regulations* [CCR]).²³ In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

The 2006 Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608), dated December 2006, were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. While these regulations are now often seen as “business as usual,” they do exceed the standards imposed by any other state and reduce GHG emissions by reducing energy demand.

²³ Although new building energy efficiency standards were adopted in April 2008, these standards do not go into effect until January 1, 2010. Thus, the 2005 standards that went into effect on October 1, 2005 remain the current Title 24 standards.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The *California Green Building Standards Code* (proposed Part 11, Title 24) was adopted as part of the *California Building Standards Code* (Title 24, CCR). Part 11 establishes voluntary standards, which will become mandatory in the 2010 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the *California Energy Code* requirements), water conservation, material conservation, and internal air contaminants.

Office of Planning and Research Advisory on CEQA and Climate Change

In June 2008, the OPR published a technical advisory entitled *CEQA and Climate Change: Addressing Climate Change Through CEQA* (OPR Advisory). This guidance, which is purely advisory, proposes a three-step analysis of GHG emissions:

1. **Mandatory Quantification of GHG Project Emissions.** The environmental impact analysis must include quantitative estimates of a project's GHG emissions from different types of air emission sources. These estimates should include both construction-phase emissions, as well as completed operational emissions, using one of a variety of available modeling tools.
2. **Assessment of "Significance" of Project-Specific GHG Emissions.** Each EIR document should assess the significance of the project's impacts on climate change. The OPR Advisory recognizes uncertainty regarding what GHG impacts should be determined to be significant and encourages agencies to rely on the evolving guidance being developed in this area. According to the OPR Advisory, the environmental analysis should describe a "baseline" of existing (pre-project) environmental conditions, and then add project GHG emissions on to this baseline to evaluate whether impacts are significant.
3. **Mitigation Measures.** According to the OPR Advisory, "all feasible" mitigation measures or project alternatives should be adopted if an impact is significant, defining feasibility in relation to scientific, technical, and economic factors. If mitigation measures cannot sufficiently reduce project impacts, the agency should adopt whatever measures are feasible and include a fact-based statement of overriding considerations explaining why additional mitigation is not feasible. OPR also identifies a menu of GHG emissions mitigation measures, ranging from balanced "mixed-use" master-planned project designs to construction equipment and material selection criteria and practices.

In addition to this three-step process, the OPR Advisory contains more general policy-level guidance. It encourages agencies to develop standard GHG emissions reduction and mitigation measures. The OPR Advisory directs CARB to recommend a method for setting the GHG emissions threshold of significance, including both qualitative and quantitative options. It should be noted that on October 24, 2008, CARB released a draft staff proposal entitled "*Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gas Emissions under the California Environmental Quality Act*" (*Draft CARB Thresholds*). However, the process of

developing statewide guidance has been halted by the CARB with no intention of continuing, and is therefore not discussed further in this document.

Senate Bill 97 (CEQA Guidelines)

SB 97 requires that OPR prepare guidelines to submit to the California Resources Agency regarding feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by CEQA. The Resources Agency is required to certify and adopt these revisions to the *CEQA Guidelines* by January 1, 2010. The Guidelines will apply retroactively to any incomplete environmental impact report, negative declaration, mitigated negative declaration, or other related document.²⁴

The Resources Agency received recommended “Amendments to the CEQA Guidelines” for greenhouse gas emissions from the Governor’s Office of Planning and Research on April 13, 2009. On July 3, 2009, the Resources Agency commenced the *Administrative Procedure Act* rulemaking process for certifying and adopting these amendments pursuant to *Public Resources Code* Section 21083.05. During the process, the Resources Agency held public hearings, received oral comments, considered both written and oral comments, and will now publish the final rule, which will take into consideration comments made.

The January 8, 2009, *Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions* state that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment:

1. Extent the project helps or hinders the goals of AB 32;
2. Extent project may increase consumption of fuel and energy resources; and
3. Extent project impacts or emissions exceed any threshold of significance.

No specific methodologies for performing an assessment are indicated, but rather it is left to the lead agency to determine the appropriate methodologies in context of a particular project.

The proposed amendments indicate that lead agencies should consider all feasible means of mitigating greenhouse gas emissions that substantially reduce energy consumption or GHG emissions. These potential mitigation measures may include carbon sequestration (i.e., long-term storage of carbon dioxide or other forms of carbon). If off-site or carbon-offset mitigation measures are proposed they must be part of reasonable plan of mitigation that the agency itself is

²⁴ Senate Bill No. 97. CHAPTER 185. An act to add Section 21083.05 to, and to add and repeal Section 21097 of, the Public Resources Code, relating to the California Environmental Quality Act. See http://www.opr.ca.gov/ccqa/pdfs/SB_97_bill_20070824_chaptered.pdf. Accessed October 29, 2009.

committed to implementing. No threshold of significance or any specific mitigation measures are indicated.

REGIONAL/LOCAL

As discussed previously, no applicable state, regional or local agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents for commercial developments. However, as discussed in the introduction to this chapter, the BAAQMD is in the process of updating its 1999 *CEQA Guidelines (CEQA Guidelines Update)*, for which the BAAQMD is proposing thresholds of significance for operational-related GHG emissions. The impact analysis presented in this chapter revisits the GHG analysis conducted for the Initial Study and discusses the proposed project's impact on climate change in light of the City's current significance criteria and the BAAQMD's proposed GHG thresholds.

City of San Francisco

The following San Francisco policies and ordinances highlight some of the City's efforts to reduce GHG emissions either directly (through reduction in personal vehicle miles traveled) or indirectly (through procurement of cleaner sources of energy).

Transit First Policy. In 1973 San Francisco instituted the Transit First Policy, which added Section 8A.115 (formerly Section 16.102) to the City Charter with the goal of reducing the City's reliance on freeways and meeting transportation needs by emphasizing mass transportation. The Transit First Policy gives priority to public transit investments; adopts street capacity and parking policies to discourage increased automobile traffic; and encourages the use of transit, bicycling and walking rather than use of single-occupant vehicles.

In 2007, voters in San Francisco passed Proposition A, which requires a reduction of GHG emissions on the order of 20 percent, specific to the transportation sector. As part of this, the San Francisco Municipal Transportation Agency is currently developing a Climate Action Plan to meet the goals of this proposition.

San Francisco has also recently adopted a Bicycle Plan that aims to encourage and increase the number of bicycle trips made in the City by further enhancing the bicycle network and adopting bicycle friendly policies.

San Francisco has adopted a commuter benefits ordinance that requires all employers in San Francisco with 20 or more employees to offer a commuter benefits program.

San Francisco Sustainability Plan. In July 1997 the Board of Supervisors endorsed the Sustainability Plan for the City of San Francisco, establishing sustainable development as a fundamental goal of municipal public policy.

The Climate Action Plan for San Francisco. In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution (Number 158-02) committing the City and County of San Francisco to a GHG emissions reduction goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the Public Utilities Commission published the *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions*. The *Climate Action Plan* provides a context for climate change in San Francisco and examines strategies to meet the 20 percent GHG emissions reduction target. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions have been implemented or are now in progress.

San Francisco Municipal Transportation Agency's Zero Emissions 2020 Plan. The SFMTA's Zero Emissions 2020 plan focuses on the purchase of cleaner transit buses including hybrid diesel-electric buses. Under this plan hybrid buses will replace the oldest diesel buses, some dating back to 1988. The hybrid buses emit 95 percent less particle matter (PM, or soot) than the buses they replace; they produce 40 percent less oxides of nitrogen (NO_x); and they reduce GHGs by 30 percent.

*LEED® Silver for Municipal Buildings.*²⁵ In 2004, the City amended Chapter 7 of the Environment Code, requiring all new municipal construction and major renovation projects to achieve LEED® Silver Certification from the US Green Building Council.

Zero Waste. In 2004, the City and County of San Francisco committed to a goal of diverting 75 percent of its' waste from landfills by 2010, with the ultimate goal of zero waste by 2020. San Francisco currently recovers 69 percent of discarded material.

Construction and Demolition Debris Recovery Ordinance. In 2006 the City and County of San Francisco adopted Ordinance No. 27-06, requiring all construction and demolition debris to be transported to a registered facility that can divert a minimum of 65 percent of the material from

²⁵ LEED (Leadership in Energy and Environment Design) is an internationally recognized green building certification system, providing third-party verification that a building or community was designed and built using strategies aimed at measurably improving performance across many different metrics including energy savings, water efficiency, CO₂ emissions reduction, and improved indoor environmental quality.

landfills. This ordinance applies to all construction, demolition and remodeling projects within the City.

Greenhouse Gas Reduction Ordinance. In May 2008, the Board of Supervisors adopted an ordinance amending the San Francisco Environment Code to establish City greenhouse gas emission targets and departmental action plans, to authorize the Department of the Environment to coordinate efforts to meet these targets, and to make environmental findings. The ordinance establishes the following greenhouse gas emission reduction limits for San Francisco and the target dates to achieve them:

- Determine 1990 City greenhouse gas emissions by 2008, the baseline against which targets are set;
- Reduce greenhouse gas emissions by 25 percent below 1990 levels by 2017;
- Reduce greenhouse gas emissions by 40 percent below 1990 levels by 2025; and
- Reduce greenhouse gas emissions by 80 percent below 1990 levels by 2050.

The ordinance also specifies requirements for City departments to prepare departmental Climate Action Plans that assess, and report to the Department of the Environment, GHG emissions associated with their department's activities and activities regulated by them, and prepare recommendations to reduce emissions. As part of this, the San Francisco Planning Department is required to: (1) update and amend the City's applicable *General Plan* elements to include the emissions reduction limits set forth in this ordinance and policies to achieve those targets; (2) consider a project's impact on the City's GHG reduction limits specified in this ordinance as part of its review under CEQA; and (3) work with other City departments to enhance the "transit first" policy to encourage a shift to sustainable modes of transportation, reducing emissions and helping to achieve the targets set forth in this ordinance.

Go Solar SF. On July 1, 2008, the San Francisco Public Utilities Commission (SFPUC) launched their "GoSolarSF" program for San Francisco's businesses and residents, offering incentives in the form of a rebate program that could pay for approximately half the cost of installation of a solar power system, and more to those qualifying as low-income residents.

City of San Francisco's Green Building Ordinance. On August 4, 2008, Mayor Gavin Newsom signed into law San Francisco's Green Building Ordinance for newly constructed residential and commercial buildings and renovations to existing buildings. The ordinance specifically requires newly constructed commercial buildings over 5,000 square feet (sq. ft.), residential buildings over 75 feet in height, and renovations on buildings over 25,000 sq. ft. to be subject to an unprecedented level of LEED® and green building certifications, which made San Francisco the city with the most stringent green building requirements in the nation at the time. Cumulative benefits of this ordinance are estimated to reduce CO₂ emissions by 60,000 tons, save 220,000

megawatt hours of power, save 100 million gallons of drinking water, reduce waste and storm water by 90 million gallons of water, reduce construction and demolition waste by 700 million pounds, increase the valuations of recycled materials by \$200 million, reduce automobile trips by 540,000, and increase green power generation by 37,000 megawatt hours.²⁶

The Green Building Ordinance also continues San Francisco's efforts to reduce the City's GHG emissions to 20 percent below 1990 levels by the year 2012, a goal outlined in the City's *Climate Action Plan*. By reducing San Francisco's emissions, this ordinance also furthers the State's efforts to reduce greenhouse gas emissions statewide as mandated by the California Global Warming Solutions Act of 2006.

The City has also passed ordinances to reduce waste from retail and commercial operations. Ordinance 295-06, the Food Waste Reduction Ordinance, prohibits the use of polystyrene foam disposable food service ware and requires biodegradable/compostable or recyclable food service ware by restaurants, retail food vendors, City Departments and City contractors. Ordinance 81-07, the Plastic Bag Reduction Ordinance, requires stores located within the City and County of San Francisco to use compostable plastic, recyclable paper and/or reusable checkout bags. The City recently passed an ordinance mandating that all persons in the City recycle and compost their waste as appropriate.

The San Francisco Planning Department and Department of Building Inspection have developed a streamlining process for Solar Photovoltaic (PV) Permits and priority permitting mechanisms for projects pursuing LEED® Gold Certification.

The City's *Planning Code* reflects the latest smart growth policies and includes requirements to provide electric vehicle refueling stations in city parking garages, a requirement that bicycle storage facilities be included in retail and office buildings, and zoning that is supportive of high-density mixed-use infill development. The City's more recent area plans, such as Rincon Hill and the Market and Octavia Neighborhood Area Plan, provide transit-oriented development policies. At the same time there is also a community-wide focus on ensuring San Francisco's neighborhoods as "livable" neighborhoods, including the *Better Streets Plan* that would improve streetscape policies throughout the City; the *Transit Effectiveness Project* (TEP)²⁷, which aims to improve transit service; and the Bicycle Plan. All of these plans promote alternative transportation options.

²⁶ These findings are contained within the final Green Building Ordinance, signed by the Mayor on August 4, 2008.

²⁷ Recommendations of the TEP were endorsed by the SFMTA Board on October 21, 2008. Environmental assessment is ongoing.

Each of the policies and ordinances discussed above includes measures that would decrease the amount of greenhouse gases emitted into the atmosphere and decrease San Francisco's overall contribution to climate change.

SENSITIVE RECEPTORS

Land uses such as schools, children's day care centers, playgrounds, hospitals, and convalescent homes are considered to be more sensitive than the general public to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with associated greater exposure to ambient air quality conditions. Recreational uses would also be considered sensitive compared to commercial and industrial areas due to the greater exposure to ambient air quality conditions. Sensitive receptors in or adjacent to the project vicinity are located at three residential buildings on the south side of Stevenson Street east of the project site.

PROJECT DESIGN FEATURES

The proposed project would be required to comply with the local ordinances discussed above, including compliance with the Green Building Ordinance, compliance with mandatory recycling and composting requirements, and providing commuter benefits to the project's employees. In addition to these requirements, the proposed project intends to be certified as LEED® Gold and will include the following features:²⁸

Daily Parking Charge. The proposed garage would require patrons to pay for parking subject to the rate structure required by *Planning Code* Section 155(g), which is intended to discourage long-term parking.

Secure Bike Parking, Showers/Changing Facilities, and Car Sharing Services. The proposed project would provide a minimum of 21 secure bicycle parking spaces, four showers and associated clothes lockers, and four car share spaces.

Energy Efficiency Beyond Title 24. The project is targeting to achieve LEED® Gold certification, part of which will be to achieve energy efficiency beyond Title 24. The project would be required to be 14 percent more efficient than Title 24 as part of compliance with the City's Green Building Ordinance. The project would be designed with all-air mechanical systems for cooling and fresh air, which would take advantage of local climate air temperatures as a means of enhancing energy efficiency. The project would also provide insulation to optimize the energy efficiency of the building envelope.

²⁸ Letter to Debra Dwyer from Martin Sawa, Urban Realty Co., Inc. October 20, 2009. This letter is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review as part of Case File No. 2005.1074E.

Shade Trees. The project would be shaded by existing street trees on Market Street, as well as new proposed street trees on Stevenson Street.

Cool Roof Materials. The project would provide a “cool roof”, which is a white colored roof membrane, which does not absorb as much solar heat into the building. Cool Roofs also help to keep the building cool and GHGs from re-radiating heat back into the environment.

Smart Meters/Programmable Thermostats. The project would provide sub-meters to monitor energy usage, and zone controls to maximize the efficiency of the ventilation system.

HVAC Duct Sealing. The project would provide duct-sealing consistent with that expected for new construction.

Low-Water Use Appliances/Fixtures. The project would provide low-flow, dual-flush toilets and sensors in lavatories.

IMPACTS

SIGNIFICANCE CRITERIA

The City and County of San Francisco has not formally adopted significance thresholds or standards for impacts related to air quality, but generally considers that implementation of a proposed project would have a significant air quality impact if it were to:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations;
- Conflict with the state goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32 (*California Global Warming Solutions Act of 2006*), such that the project's GHG emissions would result in a substantial contribution to global climate change; or
- Conflict with San Francisco's *Climate Action Plan* such that it would impede implementation of the local GHG reduction goals established by the 2008 Greenhouse Gas Reduction Ordinance.

The BAAQMD has adopted significance thresholds for air quality impacts. These thresholds are emissions of 80 pounds per day of ROG, NO_x, and PM₁₀ and emissions of 550 pounds per day of CO. Neither the BAAQMD, nor any other agency with jurisdiction over the project area, has currently adopted thresholds of significance for GHGs. As previously discussed, the BAAQMD has proposed revised significance thresholds for criteria air pollutants and new thresholds for GHG emissions. The project's impact under these thresholds, should they be adopted are

discussed at the end of this impact analysis. (See “Analysis under Proposed BAAQMD *CEQA Guidelines Update*” at the end of this section.)

METHODOLOGY AND ASSUMPTIONS

The proposed project would generate 3,580 daily vehicle trips, of which more than 2,000 vehicle trips would be net new daily vehicle trips.²⁹ Emissions from vehicle trips and natural gas combustion (direct energy use) were estimated using the URBEMIS-2007 version 9.2.4 computer model developed by the California Air Resources Board (CARB). The inputs to the URBEMIS-2007 model included the project characteristics and data from the *935-965 Market Street Transportation Study*. Inputs include trip generation rates, vehicle mix, average trip length by trip type and average speed, and daily trip generation. Average trip lengths and speeds for the City and County of San Francisco were used. The analysis was carried out assuming a 2012 vehicle mix.³⁰

The URBEMIS-2007 model also includes a construction module that calculates the emissions of construction-related criteria air pollutants and precursors. Inputs include start and end dates for the different construction phases, expected equipment to be used for each phase of construction, the amount of demolition debris to be hauled, and cubic yards of soil to be removed from the project site. The modeled emissions of construction-related criteria air pollutants and precursors are compared against the adopted BAAQMD significance thresholds.

PROJECT IMPACTS

Criteria Air Pollutants

Construction-Related Emissions

During project construction, the operation of equipment and combustion of vehicle fuel would emit hydrocarbons, nitrogen oxides (NO_x), CO, SO₂, PM₁₀, and PM_{2.5}. Dust emissions during demolition and grading would increase particulate concentrations near the project site. A portion of these emissions would likely result from equipment traveling over unpaved areas – such dust emissions would have the greatest nuisance potential. Fugitive dust is emitted during disturbance

²⁹ The term “net new” is used very conservatively to mean net new vehicle trips specific to the project site. The term “net new” does not consider relocated trips. The term net new is used to describe those vehicle trips that are in addition to vehicle trips associated with the previous office use, which represents the existing vehicle trip conditions.

³⁰ It should be noted that for GHG emissions, the local and state goals are to reduce future (year 2020) emissions back to 1990 levels. The project analysis did not calculate GHG emissions from projected year 2020 vehicles. Future year 2020 vehicles are expected to be cleaner than existing vehicles; therefore, the vehicle trip emissions are estimated conservatively and do not consider increases in fuel economy or reduced fuel carbon intensity expected by full implementation of the low carbon fuel standard (LCFS).

of soil and as a result of wind erosion over exposed earth. Dustfall can be expected at times on surfaces within 200 to 800 feet of the source.

Demolition, excavation, grading, foundation, and other ground-disturbing construction activity would affect localized air quality for up to about six months, causing a temporary increase in particulate dust and other pollutants. Sensitive receptors in proximity to the project site that could be affected by construction would include the residences in the live/work lofts located between Stevenson and Jessie Streets, immediately southeast of the project site.

The BAAQMD's current approach to analysis of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions.³¹ In order to reduce the quantity of dust generated during site preparation and construction, the City adopted the San Francisco Construction Dust Control Ordinance (July 2008) which embodies and expands upon BAAQMD's existing set of comprehensive control measures.

The proposed project is over one-half acre, and as a result, the project sponsor is required to submit a Dust Control Plan. The project sponsor would implement a variety of best management practices (BMPs) such as watering (using reclaimed water³²) all active construction areas sufficiently to prevent dust from becoming airborne without creating run – off in any area of land clearing, and/or earth movement, increased watering frequency whenever wind speeds exceed 15 miles per hour, wet sweep or vacuum the streets, sidewalks, paths and intersections where work is in progress at the end of the workday during excavation and dirt – moving activities, cover inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated materials, backfill material, import material, gravel, sand, road base, and soil with a 10 millimeter (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. These BMPs would be implemented during project construction; therefore, construction activities would be consistent with Objective 3 of the *General Plan* Air Quality Element update. In addition, the project sponsor has also agreed to implement Mitigation Measure AQ-1a as part of the project to further reduce PM₁₀ emissions during construction: the use of late-model or retrofitted equipment; the use of PuriNO_x or other fuel additives, the use of ultra-low-sulfur fuel, and/or the use of particulate traps.

³¹ BAAQMD, *CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

³² Reclaimed water must be used if required by Article 21, Section 1100 *et seq.* of the San Francisco Public Works Code.

Construction-related activities that would result in the emissions of criteria air pollutants are not typically quantified under the current BAAQMD methodology because of their temporary nature and the availability and effectiveness of the comprehensive control measures required of the project sponsor. Regardless of whether the project implements the additional control measures discussed above, compliance with the Construction Dust Control Ordinance would reduce potential construction-related air quality effects to a less-than-significant level. As this impact would be less than significant, no mitigation measures would be required.

Operational-Related Emissions

The proposed project's 264,010 gross square feet of retail are estimated to generate approximately 3,580 daily vehicle trips. Based on URBEMIS-2007 modeling results, the additional motor vehicle trips and energy use associated with the proposed project would increase the level of ROG, NO_x, and PM₁₀ in the project vicinity (see Table IV.E.3).

Table IV.E.3: Daily Operation Effects with Project under Adopted BAAQMD Thresholds

Source of Emissions	Daily Emissions in Pounds per Day			
	ROG	NO _x	PM ₁₀	CO
Stationary	2.45	3.62	0.01	3.04
Vehicle	33.3	50.02	45.38	380.09
Total	35.75	53.64	45.39	383.13
<i>Adopted BAAQMD Significance Thresholds</i>	<i>80.0</i>	<i>80.0</i>	<i>80.0</i>	<i>550</i>

Source: Donald Ballanti, Certified Consulting Meteorologist, 2009

When combined with vehicular emissions, the operational emissions of the proposed project would incrementally increase regional air pollutant emissions and precursors; however the operational emissions would not exceed the adopted BAAQMD's significance thresholds for ROG, NO_x, PM₁₀, or CO, or contribute substantially to an existing or projected air quality violation. Thus, the proposed project would not generate significant air quality impacts and sensitive receptors located in the three residential buildings at the east end of Stevenson Street would not be exposed to substantial concentrations of ROG, NO_x, and PM₁₀ emissions.

The proposed project's potential to violate existing air quality standards or contribute substantially to an existing or projected air quality violation, the project's potential to result in a cumulatively considerable net increase of any criteria air pollutant, and the project's potential to expose sensitive receptors to substantial pollutant concentrations would be considered less than significant; therefore, mitigation measures would not be necessary.

As shown in Table IV.E.3, the additional motor vehicle trips associated with the proposed project would increase the CO emissions in the project vicinity. However, the CO emissions do not exceed the BAAQMD *CEQA Guidelines* threshold that would require localized CO analysis –

550 pounds per day. Although the proposed project would generally increase CO emissions in the project vicinity, it would not cause violations of ambient air quality standards. Therefore, the proposed project would not generate significant CO-related air quality impacts and mitigation would not be necessary.

CUMULATIVE EFFECTS

Criteria Air Pollutant Emissions

According to the BAAQMD *CEQA Guidelines*, any proposed project that would have a less-than-significant air quality impact would also be considered to have a less-than-significant cumulative air quality impact if the population and vehicle miles traveled increased due to the proposed project are accounted for in the applicable CAP. For determining consistency, the BAAQMD recommends that a consistency determination be made between the proposed project and the applicable General Plan and then between the General Plan itself and the applicable CAP.

Based on the daily emissions totals shown in Table IV.E.3, the operational-related impacts of project emissions of ROG, NO_x, and PM₁₀ would be less than significant. The applicable plans for this project would be the San Francisco *General Plan* and the *Bay Area 2005 Ozone Strategy (2005 Ozone Strategy)*. San Francisco's *General Plan* includes a 1997 Air Quality Element, updated in 2000. This element is consistent with the 2000 *Clean Air Plan*.³³ The proposed project is consistent with the land use designations for the site in the *General Plan* and the *Planning Code*. For these reasons, the operational characteristics of the proposed project would not cause a cumulatively considerable increase in regional air quality pollutants.

In forecasting future stationary and mobile source emissions and preparing the *2005 Ozone Strategy*, the BAAQMD uses growth projections prepared by ABAG. The *2005 Ozone Strategy* is based on ABAG's *Projections 2003*. The BAAQMD uses the resultant emission forecasts to develop strategies and control measures that would achieve regional ozone attainment within a designated timeframe. In developing its projections, ABAG uses information from local government general plans, current zoning and other local development policies, in conjunction with economic and demographic factors. The *2005 Ozone Strategy* is based on population projections for San Francisco that assumes a greater level of development than currently forecast by the Planning Department. Therefore, upon implementation of the *2005 Ozone Strategy*, development in San Francisco, including the proposed project, would be within the growth projections forecast by the plan.

³³ BAAQMD, *Bay Area 2000 Clean Air Plan and Triennial Assessment*, adopted by the BAAQMD Board of Directors, December 20, 2000.

Based on this analysis, the proposed project would not contribute to significant cumulative air quality impacts.

Greenhouse Gas Emissions and Global Climate Change

The release of GHG emissions into the atmosphere in general is not itself an adverse environmental effect. It is the effect that increased concentrations of GHGs in the atmosphere has on the Earth's climate and the associated consequences of climate change that result in adverse environmental effects. Although emissions modeling can estimate a project's incremental contribution of GHGs into the atmosphere, it is not feasible to determine whether, or how, an individual project's relatively small contribution (on a global scale) might translate into physical effects on the environment. The Earth's climate is determined by a complex interaction of different components of Earth and its atmosphere, and therefore it is not possible to discern whether the presence or absence of GHGs emitted by the project would result in any measurable impact that would result in climate change or its adverse environmental impacts. Given that no individual project would by itself emit GHGs in any substantial amount to result in climate change, a project's GHG emissions are, by their nature, considered in light of their cumulative contribution to a global environmental impact.

OPR's June 2008 *Technical Advisory - CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review* states that "the most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide." State law defines GHG to also include hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These latter GHG compounds are usually emitted in industrial processes, and therefore not applicable to the proposed project; however, the GHG calculation does include emissions from CO₂, N₂O, and CH₄, as recommended by OPR. OPR's proposed amendments to the *CEQA Guidelines* direct lead agencies to calculate, or estimate, emissions from vehicular traffic, energy consumption, water usage and construction activities.

The proposed project would increase the activity on site by demolishing three existing two- to five-story buildings and redeveloping the site with one five-story, 90-foot-tall commercial building. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of traffic increases (mobile sources) and commercial operations associated with heating, energy use, water usage and wastewater treatment, and solid waste disposal (area sources).

The calculation presented below includes construction-related emissions in terms of CO₂E (carbon dioxide equivalents), and operational-related CO₂E GHG emissions from increased vehicular traffic, energy consumption, as well as estimated GHG emissions from solid waste disposal. While San Francisco's population and businesses are expected to increase, overall

projected water demand for San Francisco in 2030 is expected to decrease compared to current water demand, due to improvements in plumbing code requirements and additional water conservation measures implemented by the San Francisco Public Utilities Commission (SFPUC).³⁴ Given the anticipated degree of water conservation, GHG emissions associated with the transport and treatment of water usage would similarly decrease through 2030, and therefore increased GHG emissions from water usage are not expected.

Construction of the proposed project would emit 808.61 metric tons CO₂E.³⁵ Direct operational emissions of carbon dioxide equivalents (CO₂E) (including CO₂, NO_x, and CH₄ emissions) include 2,924 metric tons of CO₂E/year from transportation and 404 metric tons of CO₂E/year from heating. The proposed project would also indirectly result in GHG emissions from off-site electricity generation at power plants (approximately 1,022 metric tons of CO₂E/year) and from anaerobic decomposition of solid waste disposal at landfills, mostly in the form of methane (approximately 210.23 metric tons of CO₂E/year), for a GHG emissions total of approximately 4,560.69 metric tons of CO₂E/year. Construction-related emissions represent approximately 0.000008 percent of Bay Area GHGs emitted in 2007, and operational-related emissions represent approximately 0.00004 percent of total Bay Area GHGs emitted in 2007.³⁶

The 2020 GHG emissions limit for California, as adopted by CARB in December of 2007, is approximately 427 MMTCO₂E. The proposed project's annual contribution would be approximately 0.00001 percent of this total 2020 emissions limit, and therefore the proposed project would not generate sufficient emissions of GHGs to contribute considerably to the cumulative effects of GHG emissions on global climate change such that it would impair the state's ability to implement AB32, nor would the proposed project conflict with San Francisco's local actions to reduce GHG emissions.

³⁴ The San Francisco Public Utilities Commission's *City and County of San Francisco Retail Water Demands and Conservation Potential*, November 2004, documents the current and projected water demand given population and housing projections from Citywide Planning. This document is available at the SFPUC's website at http://sfwater.org/detail.cfm/MC_ID/13/MS_C_ID/165/C_ID/2281. Accessed October 19, 2009. The analysis provides projections of future (2030) water demand given anticipated water conservation measures from plumbing code changes, measures the SFPUC currently implements, and other measures the SFPUC anticipates on implementing. Conservation measures the SFPUC currently implements result in an overall reduction of 0.64 million gallons of water per day (mgd).

³⁵ Construction- and operation-related emissions are not intended to be additive as they occur at different points in the project's life cycle. Construction-related emissions are one-time emissions that occur prior to building occupancy. Operational-related emissions are incurred only after construction of the proposed project and are expected to occur annually for the life of the project.

³⁶ The BAAQMD reported regional Bay Area GHGs emissions in 2007 at 102.6 million CO₂E tons. Bay Area 2007 GHG emissions are used as the baseline for determining the effectiveness of City actions to reduce GHG emissions, as this is the most recent emissions inventory for the Bay Area.

OPR's guidance states that, "Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project". And, "In determining whether a proposed project's emissions are cumulatively considerable, the lead agency must consider the impact of the project when viewed in connection with the effects of "past, current and probable future projects."

As previously discussed, San Francisco has been actively pursuing cleaner energy, transportation and solid waste policies. In an independent review of San Francisco's community-wide emissions, it was reported that San Francisco has achieved a 5 percent reduction in community-wide GHG emissions below the Kyoto Protocol 1990 baseline levels. The 1997 Kyoto Protocol sets a GHG reduction target of 7 percent below 1990 levels by 2012. The "community-wide" inventory includes GHG emissions generated by San Francisco residents, businesses, and commuters, as well as municipal operations. The inventory also includes emissions from both transportation sources and from building energy.

Probable future greenhouse gas reductions will be realized by full implementation of San Francisco's Green Building Ordinance (2012), and other City policies and ordinances discussed above that will reduce overall vehicle miles traveled and increase building energy efficiency. Additional future reductions will be realized by implementation of the AB 32 Scoping Plan. The proposed project, as discussed in "Project Design Features," above, will include a number of components designed to reduce project-induced vehicle miles traveled, and increase building energy efficiency and water efficiency.

Further, the State of California Attorney General's office has compiled a list of greenhouse gas reduction measures that could be applied to a diverse range of projects.³⁷ The proposed project would meet the intent of many of the greenhouse gas reduction measures identified by the Attorney General's office: (1) As infill development, the project would be constructed in an urban area with good transit access, reducing vehicle trips and vehicle miles traveled, and therefore the project's transportation-related GHG emissions would tend to be less relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit

³⁷ State of California, Department of Justice, "*The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level.*" Updated 12/09/08. Available at: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf. Accessed October 19, 2009.

service is generally less available than in the central city of San Francisco;³⁸ (2) As new construction, the proposed project would be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings and comply with the City's Green Building Ordinance, to help reduce future energy demand as well as reduce the project's contribution to cumulative regional GHG emissions³⁹; (3) In complying with the City's Green Building Ordinance, the proposed project would also be required to divert at least 75 percent of all construction and demolition material from landfills; and (4) the proposed project would preserve existing street trees and plant new trees, regulating outdoor temperatures and aiding in carbon sequestration.⁴⁰

Given that: (1) the proposed project would not contribute significantly to global climate change such that it would impede the State's ability to meet its greenhouse gas reduction targets under AB 32, or impede San Francisco's ability to meet its greenhouse gas reduction targets under the Greenhouse Gas Reduction Ordinance; (2) San Francisco has implemented programs to reduce greenhouse gas emissions specific to new construction and renovations of residential and commercial developments; (3) San Francisco's sustainable policies have resulted in measured success in reducing greenhouse gas emissions levels, and (4) current and probable future state and local greenhouse gas reduction measures will continue to reduce a project's contribution to climate change, the proposed project would not contribute significantly, either individually or cumulatively, to global climate change.

ANALYSIS UNDER PROPOSED BAAQMD CEQA GUIDELINES UPDATE

Significance Criteria

As previously discussed, the BAAQMD has proposed updated *CEQA Guidelines* that revise the significance thresholds for air quality impacts. The proposed thresholds are emissions of 54 pounds per day of ROG, NO_x, and PM_{2.5} (or 10 tons per year); 82 pounds per day for PM₁₀ (or 15 tons per year); and 547 pounds per day of CO (or 100 tons per year). In addition, quantitative thresholds are being proposed for operational-related GHG emissions. Under the proposed thresholds a project would be considered to result in a cumulatively considerable contribution to global climate change if the project would either: (1) emit 1,100 metric tons of CO₂E per year, or (2) for mixed-use projects, emit more than 4.6 metric tons CO₂E/SP/year, where SP refers to

³⁸ The California Air Pollution Control Officer's, *CEQA and Climate Change* (January 2008) white paper identifies infill development as yielding a "high" emissions reduction score (between 3-30 percent). This paper is available online at <http://www.capcoa.org/CEQA/CAPCOA%20White%20Paper.pdf>. Accessed October 19, 2009.

³⁹ As previously discussed, the project sponsor intends to pursue LEED® Gold certification.

⁴⁰ Carbon sequestration is the capture and long-term storage of carbon dioxide before it is emitted into the atmosphere.

service population.⁴¹ As currently written, it is unclear whether the service population metric would apply to the proposed project or not because it is a commercial development and does not contain mixed uses. The BAAQMD is also not at this time considering thresholds of significance for construction-related GHG emissions.

An updated analysis of criteria air pollutant and GHG emissions is provided to illustrate how the proposed project would perform compared to the proposed BAAQMD significance thresholds and to discuss the BAAQMD-proposed GHG reduction measures and their relevance to the proposed project.

Methodology

Under the proposed update to the BAAQMD *CEQA Guidelines*, the URBEMIS-2007 model inputs were updated to estimate the construction- and operational-related emissions of the proposed project. Under the proposed methodology, the operational-related emissions of the existing uses at the project site were also calculated. These emissions were subtracted from the project totals to generate net emissions. The URBEMIS-2007 construction module has been set up to estimate criteria air pollutant and CO₂ emissions based on a detailed construction schedule that includes start and end dates for discrete activities over the various construction phases, expected equipment to be used for each phase of construction, amounts of demolition debris to be hauled, and cubic yards of soil to be exported from the site. The model utilizes “time slices” as a means of accounting for overlapping construction phases or for year changes (when the assumed equipment fleet emission factors change). The entire construction period is broken down into a series of time slices which do not overlap. Within each time slice, several different phases of construction may be occurring simultaneously.

PROJECT LEVEL IMPACTS

Construction-Related Emissions

During project construction, the operation of equipment and combustion of vehicle fuel would emit hydrocarbons, nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and suspended particulate matter (PM₁₀ and PM_{2.5}). Demolition, excavation, grading, foundation, and other ground-disturbing construction activity would affect localized air quality for up to about six months, causing a temporary increase in particulate dust and other pollutants. Sensitive receptors in proximity to the project site that could be affected by construction would include the

⁴¹ The BAAQMD *CEQA Guidelines Update* defines service population as total number of residents plus total number of jobs.

residences in live/work lofts located between Stevenson and Jessie Streets, immediately southeast of the project site.

Table IV.E.4 shows maximum daily construction emissions, in pounds per day, over the entire construction period. As directed by the proposed new BAAQMD *CEQA Guidelines Update*, the emission estimates in Table IV.E.4 include the mitigating effect of the *Basic Construction Mitigation Measures* identified in the draft document as applicable to all projects. These *Basic Construction Mitigation Measures* are the functional equivalent of the City's Construction Dust Control Ordinance; the proposed project must comply with this ordinance. It is unclear whether the daily average emissions or the maximum daily emissions would ultimately be used to compare against the proposed new significance thresholds. This analysis assumes the most conservative approach and has used maximum daily emissions.

Table IV.E.4: Maximum Daily Construction Emissions in Pounds Per Day

	Criteria Air Pollutants ^a					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Project Emissions	90.18 (68.42)	53.36	36.70	0.04	46.08	11.54
<i>Proposed New BAAQMD Thresholds</i>	54.0	54.0	547	219	82.0	54.0

Notes:

^a **Bold** indicate that emissions exceed the proposed significance thresholds.

Source: Donald Ballanti, Certified Consulting Meteorologist, October 2009

For NO_x, CO, SO₂, PM₁₀ and PM_{2.5} the maximum daily emissions do not approach the proposed BAAQMD significance thresholds. Construction-related emissions would, however, result in daily exceedances of the significance threshold for ROG. Towards the end of construction the threshold for ROG would be exceeded due to emissions from architectural coatings. However, the proposed building would have a pre-painted exterior that would not result in on-site emissions of ROG. Since URBEMIS-2007 assumes that 25 percent of the ROG emissions from this source are from the exterior of the building, this emission could be adjusted downward to 68.42 pounds per day, which would be the estimated emissions from interior coatings only. This still exceeds the 54 pounds per day threshold resulting in a significant impact – Impact AQ-2. Therefore mitigation would be required to reduce the impact to a less-than-significant-level.

Ten *Additional Construction Mitigation Measures* for projects exceeding the thresholds of significance are identified in the BAAQMD *CEQA Guidelines Update*; however, only one addresses ROG emissions from architectural coatings – “Use Low-VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings)”. The URBEMIS-2007 model assumes that architectural coatings in the Bay Area will have a VOC content of 250 grams VOC per liter. Specifying that the project would utilize coatings having an average VOC content of no more than 187 grams VOC per liter (75 percent of 250) would reduce maximum ROG emissions during construction to less than 54 pounds per day.

Therefore, should the proposed BAAQMD significance thresholds be adopted, the proposed project could implement a mitigation measure to specify that the project would use architectural coatings with an average VOC content of no more than 187 grams VOC per liter (see “Potential Mitigation Measures” at the end of this section.) The project sponsor could implement this mitigation measure should the proposed new BAAQMD thresholds be adopted, and therefore, construction-related emissions of criteria air pollutants would be less-than significant with mitigation incorporated.

Operational-Related Emissions

The proposed project’s 264,010 gross square feet of retail are estimated to generate approximately 3,580 daily vehicle trips. Operational emissions of the proposed project were analyzed using the BAAQMD’s proposed methodology and proposed thresholds of significance for criteria air pollutants and its precursors. Based on updated URBEMIS-2007 modeling results, the additional motor vehicle trips and energy use associated with the proposed project would increase the level of ROG, NO_x, and PM₁₀ in the project vicinity even after subtracting the annual emissions of the existing land uses (see Table IV.E.5). However, the increase would not be enough to exceed any of the proposed new BAAQMD significance thresholds. Therefore, if the proposed BAAQMD significance thresholds were to be adopted, the operation of the proposed project would continue to have a less-than-significant impact on regional air quality with respect to criteria air pollutants.

Table IV.E.5: Daily Operation Effects with Project under Proposed BAAQMD Thresholds

Source of Emissions	Daily Emissions in Pounds per Day					
	ROG	NO _x	PM ₁₀	CO	SO ₂	PM _{2.5}
Stationary	1.86	2.55	0.0	2.14	0.0	0.0
Vehicle	18.18	31.64	39.36	226.24	0.22	7.46
Project Total	20.04	34.19	39.36	228.38	0.22	7.46
Reduction from Existing Uses	3.79	5.39	6.04	35.18	0.03	1.15
Net Emissions	16.25	28.8	33.32	193.2	0.19	6.31
Proposed New BAAQMD Thresholds	54.0	54.0	82.0	547	219	54.0

Source: Donald Ballanti, Certified Consulting Meteorologist, 2009

Greenhouse Gas Emissions and Global Climate Change

In light of recent BAAQMD actions, the proposed project's operational-related GHG emissions were updated and assessed against the proposed new BAAQMD significance threshold.⁴² The proposed new BAAQMD *CEQA Guidelines* assign a quantitative threshold for operational-related GHG emissions. The proposed thresholds are: (1) 1,100 metric tons of CO₂E/year or (2) 4.6 metric tons CO₂E/SP/year. It is doubtful that the service population threshold would apply to the proposed project, as the project does not propose a mix of uses and is a single-use commercial development.

URBEMIS-2007 was used to estimate annual emissions of CO₂ from transportation and natural gas use. These values were used to estimate the resulting emissions of CH₄ and N₂O, which were then converted to CO₂E (CO₂ equivalents). The BAAQMD *CEQA Guidelines Update* also requires quantification of emissions resulting from off-site generation of electricity and electricity emissions from water conveyance. It should be noted that BAAQMD does not require the quantification of solid waste emissions (as shown above on page IV.E.36). Due to differences in the sources of emissions included in the GHG calculations, total emissions using the City's current methodology differ from emissions calculated using BAAQMD's methodology.

The proposed project would contribute approximately 4,364 metric tons per year of operational-related CO₂E (see Table IV.E.6). Table IV.E.6 summarizes estimated net new GHG emissions for project uses after subtracting annual emissions estimated for the existing uses. The net new GHG emissions exceeds the 1,100 metric ton CO₂E/year by almost four times resulting in Impact AQ-3. Elements of the proposed project that already result in quantifiable reductions of GHG emissions and which embody many of the efforts that have already been undertaken by the City include its location among a mix of land uses; the presence of existing local serving retail as well as the provision of value-based retail; convenient and frequent local and regional transit service; an employee transit pass program; bicycle and pedestrian lanes/sidewalks/traffic calming and end-of-trip facilities for bicyclists, i.e., secure parking and locker rooms; and a paid parking garage with car sharing services.

⁴² For construction-related GHG emissions the threshold of significance was initially the presence of BAAQMD-proposed Best Management Practices (BMPs). However, the BAAQMD updated its draft thresholds of significance in October 2009, and, in the process, decided to not include a threshold for construction-related GHG emissions because there was not sufficient evidence to determine a level at which construction emissions are significant.

**Table IV.E.6: Proposed Project's Operational-Related Net New GHG Emissions
(BAAQMD Methodology)**

Proposed Project Uses	Net GHG Emissions (Metric Tons of CO ₂ E/Year)
Transportation	2,924.17
Area Sources	404.13
Electricity Use	1,022.16
Water Conveyance	13.55
Net New GHG Emissions	4,364.01

Source: Donald Ballanti, Certified Consulting Meteorologist, October 2009

Additional URBEMIS-defined emission reductions have not been taken for the operational measures, i.e. mix of uses, local serving retail, transit service, bike and pedestrian; the transportation-demand management measures, i.e. paid parking garage, transit pass program, secure bike parking, because they are accounted for in the estimation of project vehicle trip rates. The project vehicle trip generation rate is 11.76 trips per 1,000 square feet, which reflects a very high transit, pedestrian and bicycle modal split. The lowest URBEMIS-2007 retail trip generation rate is 42.94 trips per 1,000 square feet. The transportation demand management measures included as part of the proposed project or identified as mitigation and/or improvement measures are estimated to result in 72 percent fewer vehicle trips than a similar amount of suburban development elsewhere where vehicle trip rates approach URBEMIS default values. The proposed project's location in downtown San Francisco thus potentially avoids the emission of an additional 9,160 metric tons of CO₂E/year.

In addition, the project sponsor intends to maintain the existing street trees along the Market Street frontage and plant street trees on Stevenson Street, use smart electricity meters and programmable thermostats, use cool roof materials, insulate the roof and ceiling, and ensure the proper sealing of the heating, ventilation, and air conditioning ducts as examples of how the building would be designed and constructed to increase energy efficiency beyond the Title 24 requirements (at least 14 percent more energy efficient than Title 24, as required by the San Francisco Green Building Code) and to meet or exceed the performance standards identified in the City's Green Building Ordinance as well as the Green Building Council standards for new construction.⁴³ These features are included as part of the project and are also part of the set of BAAQMD- proposed GHG reduction measures. Each of these measures, as identified in the BAAQMD *CEQA Guidelines Update*, would result in reductions in annual GHG emissions and are not reflected in the analysis of GHG emissions.

⁴³ The project sponsor intends to seek LEED® Gold certification, one of the highest levels of energy-efficient buildings in the LEED program.

The BAAQMD has also proposed a list of mitigation measures that could aid in the marginal reduction of GHG emissions. Those that are part of the proposed project include:

- a building design that maximizes interior daylight,
- increased use of roof/ceiling insulation;
- a food waste and green waste curb-side pickup service (already required in San Francisco),
- a storage area for recyclables and green waste, and
- the use of low-water appliances, fixtures, and other water-sensitive urban design practices such as drought-tolerant landscaping.

Other BAAQMD-proposed GHG reduction measures are not included in the proposed project because they are not applicable or are infeasible due to cost and/or a combination of cost and effectiveness. Proposed transportation demand management-related measures that are not applicable or are ineffective are shown in Table IV.E.7.

Table IV.E.7: Transportation Demand Management Measures

Transportation Demand Management Strategy	Discussion
Parking Cash-Out	The proposed project does not provide dedicated employee parking as this feature would only affect employee trips (2 percent of all trips.) In addition, Environment Code § 421 requires transit-related commuter benefit programs for employers with over 20 employees.
Employee Telecommute Program	This measure is impractical for retail employees.
Compressed Work Schedules	This measure is impractical for retail employees.
Guaranteed Ride Home Program.	This measure only affects employee trips (2 percent of all trips) and, as a result, would have limited effectiveness. There is currently a voluntary program available in San Francisco.
Transportation Alternatives Information	A high percentage of employees are expected to use transit regardless of incentives. The measure would have a limited effect on GHG emissions based on the small proportion of employee travel.
Dedicated Employee Transportation Coordinator	Same as above.
Carpool Matching Program	Same as above.
Preferential Carpool/Vanpool Parking	Same as above.

Two other BAAQMD-proposed measures that would not be applicable include the use of electrical landscaping equipment (the project is located on an urban site with little landscaping) and installation of a green roof (proposed project design already includes the use of cool roof materials that would be obscured by installing a green roof). The installation of solar water heaters was not considered feasible because water cycles are too quick for solar power to heat water in the boiler adequately to provide for space heating. An analysis showed that the option to install tank-less water heaters for restrooms would be cost prohibitive due to lack of demand, as the amount of hot water likely to be used by employees during their work day would be low

compared to typical residential use. The installation of solar panels was found to be cost prohibitive as the amortization period for solar panel installation is too long.

In conclusion, should the proposed BAAQMD significance thresholds be adopted, additional mitigation beyond the 50 measures listed in the BAAQMD *CEQA Guidelines Update* would have to be identified in order to reduce the project's operational-related GHG emissions to a less-than-significant level. Many of the feasible BAAQMD-proposed mitigation measures are required by the City and are already incorporated into the design and operation of the building.

Implementation of all feasible BAAQMD-proposed measures when utilizing the reductions and sector information provided by the BAAQMD, were estimated to reduce GHG emissions from natural gas combustion by between 18 and 22 percent and reduce GHG emissions from electricity by about 25 percent. With these measures the net project GHG increase is estimated to be between 3,902.82 and 3,881.93 metric tons of CO₂E/ year. This would be an overall decrease of up to about 11 percent; however, project operational-related GHG emissions would still exceed the proposed threshold of 1,100 metric tons of CO₂E/ year, and this is identified as Impact AQ-3. Since all feasible BAAQMD-proposed mitigation measures are already part of the proposed project, additional reductions afforded to the proposed project would likely have limited effectiveness in reducing GHG emissions below the proposed threshold of 1,100 metric tons of CO₂E/ year. Therefore, the proposed project would not be expected to be able to reduce GHG emissions to a less-than-significant level with additional mitigation measures not already incorporated into the proposed project and would result in a cumulatively considerable contribution to annual GHG emissions. The proposed project would be considered to result in a significant and unavoidable cumulative contribution to global climate change under the BAAQMD's proposed GHG significance threshold as there are no feasible mitigation measures identified for Impact AQ-3 at this time.

POTENTIAL MITIGATION MEASURES

This subsection presents mitigation measures(s) that would be necessary to reduce the impacts of the proposed project to less-than-significant levels if the proposed updates to BAAQMD significance thresholds for operational-related criteria air pollutant emissions are adopted. Under the proposed BAAQMD significance thresholds for ROGs, construction of the proposed project would result in Impact AQ-2. A mitigation measure has been identified that would reduce the project impact to a less-than-significant level, Mitigation Measure M-AQ-2 – Use of Low-VOC Architectural Coatings. To reduce the impact to a less-than-significant level, architectural coatings with an average VOC content of no more than 187 grams VOC per liter could be used. This mitigation measure could be implemented by the project sponsor if the proposed BAAQMD thresholds were adopted prior to project approval. Incorporation of Mitigation Measure M-AQ-2 would reduce the project's significant construction-related impact (as determined by exceedances of BAAQMD proposed thresholds) to a less-than-significant level.

V. OTHER CEQA CONSIDERATIONS

A. GROWTH INDUCEMENT

A project is considered growth-inducing under the California Environmental Quality Act if:

[It] could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. (*CEQA Guidelines* §15126.2(d))

The project sponsor is proposing to intensify retail uses in downtown San Francisco by replacing three vacant buildings on three adjacent lots midblock between Fifth and Sixth Streets with a new retail center. The proposed project is an infill project consistent with uses permitted in the C-3-G/C-3-R District. It would not require major new infrastructure. It does not include residential development, so it would not induce population growth directly through the construction of housing, nor would it displace any residential units.

Since the development project would not have unusual labor requirements, construction workers are anticipated to come from the local workforce. Therefore, since it is assumed that these workers would not be new to San Francisco or the surrounding Bay Area, the number of workers required to construct the proposed project would not be expected to induce population growth in San Francisco nor increase the demand for housing and community services.

Employment on the project site is expected to increase due to the new retail uses. The proposed project would employ approximately 750 full-time persons. As discussed in the Initial Study (see Appendix A, p. 34), the potential increase in employment would not be considered significant in the context of total employment in greater San Francisco.

As discussed in the Initial Study (see Appendix A, p. 35), the increase in employment on the project site could potentially result in an increase in the demand for housing, assuming conservatively that at least some of the new retail employees on the project site would be new to San Francisco. An estimated 338,920 households resided in San Francisco in 2005. By 2010, the number of households is expected to increase by about 9,400 to about 348,330, an increase of about three percent.¹ Based on assumptions about commute patterns and household size, the

¹ ABAG, *Projections 2007*.

proposed project (with an estimated 750 employees) would generate a potential demand for about 295 new dwelling units in San Francisco.² These new households would represent about 3.1 percent of the City's estimated household growth by the year 2010. The Initial Study concluded that although the increase in employment on the project site could potentially result in an increase in the demand for housing, assuming conservatively that at least some of the new retail employees on the project site would be new to San Francisco, this potential increase in housing demand as a result of the proposed project would not be considered substantial in the context of total housing demand in San Francisco. The Initial Study also concluded that the actual increase in housing demand due to the project would likely be lower, as at least some of the project employees would likely not be new to San Francisco.

Based on this analysis, the proposed project would not cause significant growth-inducing impacts.

B. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21067 of CEQA and with Section 15126(b) of the *CEQA Guidelines*, the purpose of this section is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the proposed project, or by other mitigation measures that could be implemented, identified in Chapter IV, Environmental Setting and Impacts.

The findings of significant impacts are subject to final determination by the Planning Commission as part of the certification process for the EIR. If necessary, this chapter will be revised in the Final EIR.

With implementation of the mitigation measures listed in Chapter IV, Environmental Setting and Impacts, and in the Initial Study, the potentially significant project-related impacts with respect to cultural resources and hazardous materials, and with respect to traffic along Stevenson Street would be reduced to less-than-significant levels. The project-specific significant impact at the intersection of Fifth Street/Stevenson Street would remain because identified mitigation measures are not expected to be feasible.

Cumulative effects are by their nature more speculative, because their analysis depends on a prediction of possible future environmental changes well beyond the construction of the proposed

² This method multiplies the estimated project-related employment (750 employees) by the proportion of jobs in San Francisco held by people who live in the City (55 percent). This result, the approximate number of project-related employees who would live in the City (413), is divided by the projected number of workers per household in San Francisco (1.2). The estimated housing demand would be about 344 residential units. Based on data from ABAG *Projections 2007* and the Metropolitan Transportation Commission.

project. However, the proposed development is projected to make a considerable contribution to cumulative traffic increases at two locations under projected 2030 Cumulative conditions: Fifth Street/Stevenson Street and Fifth Street/Mission Street. Cumulative traffic impacts generated at these intersections remain because identified mitigation measures are not expected to be feasible or feasibility is uncertain.

C. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This EIR focuses on transportation and circulation, transportation-related noise, and transportation-related and operation-related air quality issues. In addition, supplemental analysis with respect to construction-related and operational-related emissions as they relate to criteria air pollutants and greenhouse gas emissions (GHGs) pursuant to the BAAQMD's proposed new thresholds of significance is discussed. Land use and aesthetic issues are discussed for informational purposes. In the Initial Study, all other potential environmental effects were found to be less than significant or reduced to a less-than-significant level with mitigation measures agreed to by the project sponsor.

On October 1, 2008, the Planning Department issued a "Notice of Preparation of an Environmental Impact Report and Initial Study." Comment letters from two public agencies were received; neither raised areas of controversy or special issues needing analysis. One comment suggested that a transportation study be conducted; a transportation study was in preparation at the time and has been completed for use in this Draft EIR. Since publication of the Notice of Preparation Initial Study, the Planning Department received three letters from the public/interested parties and one phone call in favor of the proposed project in response to the Notice of Preparation/Initial Study. The Alliance for a Better District 6 letter expressed concern regarding the proposed parking, truck traffic on Fifth Street, effects of traffic congestion on Sixth Street, and the proposed open space design. The Sierra Club letter also expressed concern about parking impacts and indicated a preference for analyzing a mixed use project alternative with housing over retail. The Pearl Art and Craft Supplies letter expressed concern about loading activities, particularly on Stevenson Street, and proposed loading mitigation and improvement measures.

VI. ALTERNATIVES

This chapter identifies alternatives to the proposed project and discusses the environmental effects associated with them. The *CEQA Guidelines* require that an EIR describe a reasonable range of feasible alternatives to the proposed project that could attain most of the basic project objectives. The alternatives considered should focus on elimination or reduction of significant adverse impacts caused by the proposed project. An EIR need not consider every conceivable alternative to the project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. The determination of feasibility will be made by project decision-makers based on substantial evidence in the record, which includes, but is not limited to, information presented in the EIR, comments received on the Draft EIR, and responses to those comments.

The analysis of alternatives is of benefit to decision-makers because it provides more complete information about the impacts of land use decisions, and consequently a better understanding of the inter-relationships among all of the environmental topics under evaluation. The City must consider approval of an alternative if that alternative would substantially lessen or avoid significant environmental impacts identified for a proposed projects and that alternative is determined to be feasible.

The following alternatives to the proposed project are discussed and evaluated in this chapter: A. No Project Alternative; B. Reduced Intensity Alternative; and C. No Garage Alternative. Table VI.1 summarizes the significant effects of the proposed project and Alternatives B and C. The No Project Alternative is not included in this table.

A. NO PROJECT ALTERNATIVE

CEQA requires an EIR to evaluate a No Project Alternative. The purpose of the No Project Alternative is to allow decision-makers to compare the effects of the proposed project with the effects of taking no action.

DESCRIPTION

Under the No Project Alternative, the site would remain in its existing condition. This alternative would not demolish or otherwise change the former theater at 945-965 Market Street, and the 935-939 Market Street and 941-945 buildings would not be demolished and would continue to operate as office buildings with ground-floor retail. Under this alternative the three parcels would not be consolidated, and the proposed project's 90-foot-tall, 375,700-gsf retail building with three underground levels (two reserved for parking) would not be constructed. This alternative, however, would not preclude future proposals for redevelopment of the different parcels for uses

permitted in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Districts, and building proposals in conformance with the 120-X Height and Bulk District.

Table VI.1: Comparison of Impacts of the Proposed Project to Alternatives B and C

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C: No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking 201 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking
Impacts			
Land Use	No significant effects	No significant effects	No significant effects
Aesthetics	No significant effects	No significant effects	No significant effects
Transportation and Circulation	TR-1: Deterioration in the Level of Service at the Fifth Street/Stevenson Street intersection from LOS D to LOS E. Mitigation is considered infeasible.	No significant effect at the Fifth Street / Stevenson Street intersection.	No significant effect at the Fifth Street / Stevenson Street intersection.
	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street /Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.
	TR-3: Considerable contribution to a significant cumulative traffic impact at the Fifth Street/Stevenson Street intersection. Mitigation is considered infeasible.	No contribution to significant cumulative impact at the Fifth Street/Stevenson Street intersection.	No contribution to significant cumulative impact at the Fifth Street / Stevenson Street intersection.
	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street/Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street /Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	No considerable contribution to significant cumulative traffic impact at the Fifth Street / Mission Street intersection.
	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	Considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection. No feasible mitigation identified.
Noise	No significant effects	No significant effects	No significant effects

Table VI.1 (continued)

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C: No Garage Alternative
Impacts			
Air Quality ^a	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.
	AQ-3: Construction of the proposed project would result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO ₂ E per year.

Note:

^a The significant Air Quality impacts identified here would occur if the significance thresholds in the current BAAQMD *CEQA Guidelines Update* are adopted. Under the significance thresholds currently utilized by the City of San Francisco, neither the proposed project nor the alternative would result in a significant air quality impact.

ENVIRONMENTAL ANALYSIS

This analysis assumes that the existing structure and uses would not change and reflects existing physical conditions in the project vicinity. If existing physical conditions in the project area were to continue for the foreseeable future, conditions described in detail for each environmental topic in the Initial Study and in Chapter IV, Environmental Setting and Impacts, would remain. If the No Project Alternative were implemented, none of the impacts associated with the proposed project would occur. The proposed project's significant and less-than-significant impacts described in Chapter IV, Environmental Setting and Impacts, under the subsections of Transportation and Circulation, Noise, and Air Quality would not occur. In addition, the other less-than-significant effects (including those that would be mitigated) of the proposed project described in the Initial Study would not occur with this alternative, and no mitigation measures would be necessary. These other less-than-significant effects include: land use; aesthetics; population and housing; cultural and paleontological resources; transportation and circulation (air traffic patterns); noise (groundborne vibration, construction noise, aircraft noise, interior noise levels); air quality (odors, greenhouse gas emissions); wind and shadow; recreation; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; hazards/hazardous materials; minerals/energy resources; and agricultural resources.

B. REDUCED INTENSITY ALTERNATIVE

DESCRIPTION

This alternative would include approximately half of the gross floor area of the proposed project. The alternative would be intended to reduce potentially significant traffic impacts of the proposed project due to a reduction in project-generated vehicle trips and truck trips compared to those generated by the proposed project. Specifically, the Reduced Intensity Alternative would include about 124,350 gsf of retail uses; about 39,925 gsf of parking (not including loading or driveways and maneuvering spaces); and about 7,810 gsf of building services (common areas, mechanical, and storage spaces). The building developed under the Reduced Intensity Alternative would be about 56 feet tall, excluding the mechanical penthouse. It would have three above-ground floors of retail space and one subsurface level for retail parking with 80 parking spaces. The proposed building would retain the same number of loading docks (four with one reserved for waste handling) and bicycle parking facilities. The subsurface level would be approximately the depth of the existing 10-foot-deep basement on the project site. The Reduced Intensity Alternative would not include a mezzanine retail floor or a subsurface retail floor, unlike the proposed project.

Like the proposed project, a conditional use authorization (CU) would be required for demolition of a former theater use. A CU would also be required for retail parking that is in excess of permitted accessory parking, as would approval from the Department of Public Works for the merger of three existing parcels. In addition, variances for the number and the dimension of façade openings for off-street parking and off-street loading would continue to be required. However, under this alternative, the project sponsor would not require a transfer of development rights, because the proposed building would not exceed the base floor area ratio of 6:1. This alternative would not require an exception to the requirements for freight loading spaces, as both the *Planning Code* loading requirements and the average and peak demand would be met through the provision of three loading spaces.

ENVIRONMENTAL ANALYSIS

Land Use

Similar to the proposed project, development of this alternative would not result in the physical division of an established community; would not conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the project site; and would not have a substantial impact on the character of the vicinity. The less intense development that would occur under this alternative would not generate the same level of activity that would occur with the original project. Therefore, as with the findings in the Initial Study showing that the proposed project

would have less-than-significant impacts on all issues related to land use, the Reduced Intensity Alternative would result in less-than-significant land use impacts.

Aesthetics

As a result of the reduced height – from 90 feet to 56 feet – views of the project site under this alternative would be slightly different than would occur under the proposed project. The proposed building under this alternative would be 38 feet shorter than the existing building at 935-939 Market Street. It would be about 26 feet taller than the immediately adjacent building at 941-945 Market Street instead of 60 feet taller and would be shorter than many other nearby buildings. As with the proposed project, the rectilinear massing and profile of the proposed building would remain consistent with the existing pattern of buildings along Market Street in the vicinity of the project site, and likewise at the rear of the buildings along Stevenson Street. Building materials and lighting would be similar to the proposed project. Therefore, as with the findings in the Initial Study and the discussion in Section IV.B, Aesthetics, showing that the proposed project would have less-than-significant impacts on all issues related to aesthetics, the Reduced Intensity Alternative would result in less-than-significant aesthetic impacts.

Transportation and Circulation

Transportation and Circulation Assumptions

Compared to the proposed project, the amount of proposed retail development would be slightly less than half under the Reduced Intensity Alternative, resulting in substantial reductions in trip generation. Table VI.2 shows the trip generation characteristics of the Reduced Intensity Alternative. This alternative would result in 672 weekday PM peak hour person trips, compared to 1,720 with the proposed project.¹

The Reduced Intensity Alternative would also result in substantially fewer person trips during the weekday PM peak hour across all modes, with 52 inbound and 58 outbound vehicle-trips during the weekday PM peak hour, less than half of the vehicle trips generated with the proposed project. In addition, the reduction in the amount of retail space provided under this alternative would result in decreased demand for parking and loading as well as a reduction in the number of delivery/service vehicle trips.

¹ AECOM, “*Supplementary Impact Analysis – CityPlace Reduced Intensity Alternative*”, October 26, 2009. This memorandum provides a brief analysis of the traffic impacts of the Reduced Intensity Alternative, and is summarized here. It is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review as part of Case File No. 2005.1074E.

Table VI.2: Net Project Person-Trip Generation – Reduced Intensity Alternative

Land Use	Size	Weekday Daily Person-Trips	Weekday PM Peak Hour Person-Trips
Retail	124,350 sq ft	10,363	933
Existing Uses	--	(2,900)	(261)
<i>Net-New Project Trips</i>		7,463	672

Note: This table reflects the project person-trip generation after the application of the cross-shopping factor of 1.8.

Source: AECOM, October 2009

Existing Conditions Plus Reduced Intensity Alternative

Under Existing Plus Reduced Intensity Alternative conditions, the alternative would remove the significant impact at the Fifth Street/Stevenson Street intersection that would occur under the proposed project. Although the intersection would still satisfy the Manual of Uniform Traffic Control Device (MUTCD) peak hour traffic signal warrant under Existing Plus Reduced Intensity Alternative conditions, it would continue to operate at acceptable conditions LOS D. Therefore, the project would not result in a significant impact at this intersection under the Reduced Intensity Alternative.

Loading would occur from Stevenson Street, as for the proposed project. Loading demand would be reduced with this alternative, but the significant impacts from large trucks (greater than 30 feet) at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections identified for the proposed project would still occur with this alternative. The same mitigation measure, to limit loading by large trucks to the night time hours between 10:00 PM and 6:00 AM, would continue to apply reducing the potential loading impact to less than significant.

With this alternative, the decreased demand for parking during the weekday midday period (from 480 spaces to 226 spaces) would result in a smaller shortfall compared to the proposed project (from 279 spaces to 146 spaces). This shortfall can be accommodated by public parking facilities in the area that have surplus capacity, such as the Fifth/Mission, the Ellis/O'Farrell, and the Union Square garages. Parking deficits are considered to be social effects, rather than impacts on the physical environment as the supply of parking is not part of the permanent physical environment. Although the social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle-trips due to others who are aware of constrained parking conditions in a given area. Hence, any

secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise, and pedestrian safety analyses, reasonably address potential secondary effects. Therefore, as with the proposed project, there would be no significant parking impact.

2030 Cumulative Conditions Plus Reduced Intensity Alternative

Under 2030 cumulative conditions with the Reduced Intensity Alternative there would not be a significant impact at the Fifth Street/Stevenson Street intersection unlike conditions with the proposed project. The intersection would continue to satisfy the MUTCD peak hour traffic signal warrant under cumulative conditions and would operate at acceptable LOS D.

The substantial contribution to significant cumulative impacts at Fifth Street/Mission Street would remain. Although the alternative would result in a reduction in the total cumulative volume of traffic at the southbound approach (from 12.7 percent to 8.3 percent), the alternative would still contribute substantially to the total traffic at the southbound approach. Mitigation would be similar to that for the proposed project, to restrict northbound and southbound left turns at the intersection (including taxi and bus movements) to improve intersection operating conditions from LOS E to LOS D. This would reduce the impact to a less-than-significant level. However, the feasibility of this mitigation measure is uncertain at this time. Modifying the intersection cycle timing was also considered; the level of service could be improved from LOS E to LOS D, but doing so at the Fifth Street/Mission Street intersection would not be feasible because of the coordinated timing for MUNI operations. Therefore, the cumulative impact at the intersection of Fifth Street and Mission Street would remain significant and unavoidable.

Noise

Traffic-related noise impacts were determined to be less than significant for the proposed project. Retail space would be reduced and fewer shoppers would be attracted to the CityPlace project under this alternative than under the proposed project. As a result, automobile trips and service/delivery vehicle trips would be reduced and traffic noise would be less than with the proposed project, and therefore, no significant noise impact would occur.

Air Quality

Retail space would be reduced and fewer shoppers would be attracted to the CityPlace project under this alternative than under the proposed project. As a result, automobile trips, bus trips, and truck trips would be reduced and traffic-related air quality effects would be less than under the proposed project, which were determined to be less-than-significant. Therefore, the Reduced Intensity Alternative would not result in significant traffic-related or operational-related impacts

to air quality. In comparison to the proposed project this alternative would likely reduce net new greenhouse gas emissions in comparison to the proposed project primarily because of the lower number of project-generated vehicle trips. Therefore, the Reduced Intensity Alternative's GHG emissions would remain less than significant using the City's significance criteria. Under the proposed BAAQMD significance criteria, however, it is not likely that the reduction in GHG emissions would be sufficient to allow this alternative to meet the proposed new operational-related GHG emissions threshold of 1,100 MTCO₂E, as outlined in the BAAQMD *CEQA Guidelines Update* documents circulated in September and October 2009. Therefore, if this significance threshold were to be adopted in its current form, the Reduced Intensity Alternative would have a significant impact on global climate change that may not be able to be reduced to a less-than-significant level. In addition, the CityPlace project would result in an exceedance of the proposed threshold for ROG due to emissions from architectural coatings. However, as described in the Air Quality discussion in Section IV.E, this impact could be mitigated as described in Mitigation Measure AQ-2 – Use of Low-VOC Architectural Coatings. The amount of ROG emissions for the Reduced Intensity Alternative would be less than for the proposed project and could be mitigated as described in Mitigation Measure AQ-2. Based upon the above discussion, the impact for the Reduced Intensity Alternative would remain significant and unavoidable under the proposed BAAQMD guidelines.

C. NO GARAGE ALTERNATIVE

DESCRIPTION

Under this alternative, the proposed new retail building would not include a parking garage. Without the provision of an on-site parking garage, both employees and visitors would use public transit or would need to seek parking in other facilities in the area. The No Garage Alternative would reduce potential project impacts related to the use of Stevenson Street for garage access. In all respects except the elimination of the parking garage, this alternative would be the same as the proposed project. The proposed retail space and pedestrian access would be the same, and the alternative would retain the loading dock and bicycle parking facilities. To accommodate merchandise pick-up by shoppers, the project sponsor would include an on-site loading area in a partial basement level, with access from Stevenson Street.

The project approvals that would be required under this alternative would be slightly different than those required with the proposed project. The Conditional Use authorization (CU) for retail parking in excess of permitted accessory parking that would be required for the proposed project would not be required under this alternative. However, the variances for the number and the dimension of façade openings for off-street parking and off-street loading would continue to be required, as would an exception to the requirements for freight loading spaces. Under this alternative, the removal of the non-accessory parking (approximately 58,140 gsf) which is calculated in the

building FAR may result in a change in the amount of transferable development rights (TDR) space needed or may result in no need for a TDR, depending on whether a variance from the requirements of *Planning Code* Section 102.11 is granted and on the applicability of the exceptions to FAR calculation identified in *Planning Code* Section 102.9(b). If the variance were not granted, the amount of TDR space necessary for the proposed project could be approximately 36,721 gsf.

ENVIRONMENTAL ANALYSIS

Land Use

Similar to the proposed project, development of this alternative would not result in the physical division of an established community; would not conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the project site; and would not have a substantial impact on the character of the vicinity. Therefore, as with the findings in the Initial Study showing that the proposed project would have less-than-significant impacts on all issues related to land use, the No Garage Alternative would result in less-than-significant land use impacts.

Aesthetics

The No Garage Alternative does not include any changes to the building design or the height of the building. Therefore, as with the proposed project and as described in the Initial Study and in Section IV.B, Aesthetics, there would be a less-than-significant impact on aesthetics.

Transportation and Circulation

Transportation and Circulation Assumptions

The No Garage Alternative would include the same amount of retail development as with the proposed project. In order to accommodate retail shopper pick-up of merchandise from the proposed retail uses, the project sponsor would provide an on-site shopper loading area in the same location as the parking garage entrance in the proposed project, just west of the proposed loading dock. The on-site shopper loading area would generate vehicle travel demand during the weekday PM peak hour. A portion of the project travel demand assigned to and from this loading area is reflected in the traffic analyzed for this alternative. Although the trip generation characteristics would be similar to those of the proposed project, the assignment of traffic to streets in the vicinity of the project site would differ with this alternative. The project-related demand for parking and loading under the No Garage Alternative would be the same as that for the proposed project.

Existing Conditions Plus No Garage Alternative

Approach and Methodology

Vehicles generated by the No Garage Alternative were reassigned to nearby garages that have available capacity during the weekday midday peak period. Based on the available capacity at each facility and their proximity to the proposed project site, it was estimated that about 75 percent of all project traffic would use the Fifth/Mission garage, 15 percent would use the Ellis/O'Farrell garage, and 10 percent would use the Union Square Garage.

In addition to assigning vehicles to nearby garages, a portion of drivers were assigned to the proposed on-site shopper loading area on Stevenson Street. Of the peak period vehicles generated by the alternative, it was estimated that 10 percent would use the proposed on-site shopper loading area during the weekday PM peak hour.

Due to the reassignment of vehicles to nearby parking garage, two additional intersections (Fourth Street/Howard Street and Stockton Street/O'Farrell Street) were evaluated because of their proximity to parking garages. Under the No Garage Alternative, many of the project vehicles exiting the Fifth/Mission garage would travel through the Fourth Street/Howard Street intersection. Similarly, vehicles to and from the other two nearby parking garages would travel through the Stockton Street/O'Farrell Street intersection. Vehicle counts for the two intersections were conducted on June 24, 2008. The intersection LOS results for the No Garage Alternative are summarized in Table VI.3.

Traffic and Circulation Impacts

Except for the Fourth Street/Market Street intersection, all study intersections (including the two new locations) would continue to operate at acceptable conditions (LOS D or better) under the No Garage Alternative. The significant impact at the Fifth Street/Stevenson Street intersection that would occur under the proposed project would be eliminated under the No Garage Alternative.

Therefore, the set of mitigation measures identified to reduce this impact to less-than-significant levels under the proposed project – installation of midblock traffic signal, prohibition of left turns, or the reconfiguration of the portion of Stevenson Street between the project site and Sixth Street to two-way operation – would not be necessary. Under the No Garage Alternative a total of 11 vehicles would be added to the southbound through movement at the Fourth Street/Market Street intersection. This contribution would add vehicles to the critical movements at this intersection.

Similar to the proposed project, the addition of these vehicles would not represent a significant contribution to the deficient operations at the intersection under the No Garage Alternative and no mitigation would be necessary.

Table VI.3: Intersection LOS – Existing plus No Garage Alternative Conditions

Intersection		Existing Conditions		Existing plus Project Conditions		Existing plus Project–No Garage Alternative Conditions	
		LOS	Delay	LOS	Delay	LOS	Delay
1.	Fourth/Market	F	>80.0	F	>80.0	F	>80.0
	<i>With Enforcement</i>	<i>F</i>	<i>>80.0</i>	<i>F</i>	<i>>80.0</i>	<i>F</i>	<i>>80.0</i>
2.	Fourth/Mission	C	28.7	C	29.0	C	28.9
	<i>With Enforcement</i>	<i>D</i>	<i>39.1</i>	<i>D</i>	<i>39.7</i>	<i>D</i>	<i>39.3</i>
3.	Fifth/Market	C	27.0	C	28.6	C	27.4
	<i>With Enforcement</i>	<i>C</i>	<i>28.2</i>	<i>C</i>	<i>30.1</i>	<i>C</i>	<i>28.6</i>
4.	Fifth/Stevenson ^a	D	27.6	E	44.1	D	27.3
5.	Fifth/Mission ^b	C	29.5	D	40.9	D	31.0
	<i>With Enforcement</i>	<i>C</i>	<i>31.8</i>	<i>D</i>	<i>43.5</i>	<i>D</i>	<i>33.4</i>
6.	Fifth/Howard	C	22.3	C	25.2	C	26.8
7.	Sixth/Market	C	29.1	C	30.2	C	29.4
	<i>With Enforcement</i>	<i>C</i>	<i>31.0</i>	<i>C</i>	<i>32.2</i>	<i>C</i>	<i>31.2</i>
8.	Sixth/Stevenson ^a	C	21.9	C	22.0	C	22.0
9.	Sixth/Mission	D	36.7	D	39.1	D	39.7
	<i>With Enforcement</i>	<i>D</i>	<i>40.8</i>	<i>D</i>	<i>42.9</i>	<i>D</i>	<i>48.3</i>
10.	Fourth/Howard	D	38.8	D	39.4	D	51.5
11.	Stockton/O'Farrell	C	32.5	C	32.8	C	34.1

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes.

^a Stevenson Street at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

^b The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At the time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the *San Francisco Bicycle Plan EIR*.

Source: AECOM – October 2009

Loading impacts with the No Garage Alternative would be the same as those identified for the proposed project, and the same mitigation and improvement measures would be applicable. Mitigation Measure M-TR-2 would establish a loading dock scheduling program for each project retail tenant; limit loading of project-related trucks greater than 30 feet to the hours between 10:00 PM and 6:00 AM every day; prohibit all project-related truck loading to the proposed project between 3:00 PM and 6:00 PM due to the P.M peak period tow-away lane on northbound Sixth Street; prohibit project retail tenants from using trucks longer than 45 feet; station the proposed project's loading dock manager on site to help direct trucks of all sizes into and out of the loading dock, to control traffic on Stevenson Street at all times the loading dock is available for loading activity, and to implement and enforce the dock scheduling program. In addition, the project sponsor would work with the owners of other land uses on Stevenson Street to incorporate their loading activities in the loading dock when the proposed project's retail uses do not need the

loading dock spaces, with the intent of providing safe off-street loading spaces to nearby land uses and minimizing double parking of trucks on Stevenson Street.²

Parking Impacts

Similar to the proposed project, the No Garage Alternative would generate a demand for 480 parking spaces during the weekday midday peak period. Under both alternatives, the nearby parking garages have a sufficient number of unoccupied parking spaces to accommodate the project vehicles. Based on the reassignment of project vehicles under the No Garage Alternative, the estimated increase in weekday midday peak period occupancy at the major parking garages would be as follows:

- Fifth/Mission Garage:
Increase from 63 to 77 percent occupancy (360 additional vehicles)
- Ellis/O'Farrell Garage:
Increase from 83 to 89 percent occupancy (72 additional vehicles)
- Union Square Garage:
Increase from 83 to 88 percent occupancy (48 additional vehicles)

Compared to the proposed project, the No Garage Alternative would not increase area-wide parking capacity (construction of the proposed 201-space parking garage would increase area-wide parking capacity by 3.5 percent.) The No Garage Alternative would increase the existing overall occupancy rate at the nearby parking garages from 74 percent to 82 percent, compared to 78 percent for the proposed project. Additionally, the removal of the parking garage from the project would substantially reduce the parking garage-related conflicts that would occur when vehicles access Stevenson Street from Sixth Street, cross the north sidewalk to enter and exit the parking garage, and when vehicles exit from Stevenson Street to Fifth Street. With no on-site garage, project-related vehicles accessing Stevenson Street would be associated with the on-site shopper loading area or would be delivery trucks as discussed under loading impacts.

Pedestrian Impacts

Under the No Garage Alternative, the reassignment of vehicles to the nearby garages would result in all trips to the project site becoming walk trips. This would result in approximately 850 additional pedestrians on the sidewalks and crosswalks in the project area during the weekday PM peak hour parking demand. These additional pedestrians would augment the 1,034 pedestrian and transit trips already headed to and from the project site during the weekday PM peak hour.

² It is noted that the use of the proposed project's loading dock may not be a feasible option for other land uses on Stevenson Street.

The largest increases in pedestrian traffic would occur at the Fifth Street/Mission Street intersection, because the majority of project-related vehicle trips were assigned to the nearby Fifth/Mission garage (75 percent). The additional pedestrian and vehicular traffic between the project site and the Fifth/Mission garage would likely create more congested pedestrian conditions compared to the conditions with the proposed project, especially at the crosswalks and the channelized northbound right-turn movement at the Fifth Street/Mission Street intersection.

Compared to the proposed project, an approximately 25 percent increase in project-related pedestrians and vehicles destined to the Union Square garage and the Ellis/O'Farrell garage would occur under the No Garage Alternative. These additional vehicles and pedestrians could potentially worsen pedestrian conditions at the crosswalks and corners in Union Square that are congested during periods of peak shopping activity. However, the No Garage Alternative would have a minimal effect on pedestrian conditions in the Union Square area as the majority of the project-generated pedestrians would walk between the project site and the Fifth/Mission garage.

Overall, due to the additional vehicular and pedestrian activity that would occur at the Fifth/Mission, Union Square, and Ellis/O'Farrell parking garages under the No Garage Alternative, pedestrian conditions would be somewhat worse compared to the proposed project. However, the increased pedestrian and vehicular activity would not result in significant impacts to pedestrian circulation as the number of project-related pedestrians would not be so great as to impede pedestrian circulation in the area.

Other Transportation Impacts

The No Garage Alternative would have effects similar to those of the proposed project on transit, loading, bicycle, and construction-related traffic and parking. Under the No Garage Alternative, a general reduction in traffic volumes on the streets and alleyways adjacent to the project site would occur, while traffic volumes on the streets surrounding the Fifth/Mission, Union Square and Ellis/O'Farrell parking garages would increase.

2030 Cumulative Conditions Plus No Garage Alternative

There would be significant cumulative traffic impacts due to anticipated traffic growth which would cause or exacerbate adverse LOS E or F intersection operations at the following seven study intersections under 2030 Cumulative Conditions Plus No Garage Alternative. The following intersections would operate at LOS E or F under 2030 Cumulative conditions:

- Fourth Street/Market Street;
- Fifth Street/Mission Street;
- Fifth Street/Howard Street;

- Sixth Street/Market Street;
- Sixth Street/Mission Street;
- Fourth Street/Howard Street; and
- Stockton Street/O'Farrell Street.

The No Garage Alternative would not result in a cumulatively considerable contribution to the significant cumulative traffic impacts at the Fourth Street/Mission Street and Fifth Street/Market Street intersections.

Compared to the 2030 Cumulative Conditions Plus Project, the No Garage Alternative would not result in a significant and unavoidable impact at the Fifth Street/Stevenson Street intersection. The No Garage Alternative would not add a substantial number of vehicles to the eastbound approach of the Fifth Street/Stevenson Street intersection. As a result, the 2030 Cumulative Conditions LOS at this intersection would be LOS D under the No Garage Alternative. The vehicle reassignment would also result in slightly different 2030 Cumulative traffic volumes and delays at the Fifth Street/Mission Street and Fifth Street/Howard Street intersections. However, the reassignment would not change the Cumulative LOS at these intersections from LOS E under the 2030 Cumulative Conditions Plus Project scenario.

The seven study intersections that would operate at LOS E or F under 2030 Cumulative Condition Plus No Garage Alternative were also reviewed using two different factors: the traffic generated by the alternative as a percent of total 2030 Cumulative traffic volumes, and as a percent of only the increase in traffic volumes between Existing and 2030 Cumulative conditions. The contribution to total volumes and overall growth at each study intersection under the No Garage Alternative is summarized in Table VI.4. The contributions of the No Garage Alternative to the critical movements³ at these intersections are summarized in Table VI.5.

At the Fourth Street/Market Street, Sixth Street/Market Street, and Stockton Street/O'Farrell Street intersections, the No Garage Alternative would make a minimal contribution (between 0.3 and 3 percent) to the growth in traffic volumes from Existing to 2030 Cumulative Conditions Plus No Garage Alternative. Although the alternative would add vehicles to poorly-operating critical movements at each location (southbound through at Fourth Street/Market Street, northbound through at Sixth Street/Market Street, and southbound through at Stockton Street/O'Farrell Street), the contribution to the total volumes at these movements would be very low (between 0.1 percent and 0.7 percent). Therefore, traffic generated by the alternative would not represent a cumulatively considerable contribution to the significant cumulative traffic impacts at the Fourth Street/Market Street, Sixth Street/Market Street, or Stockton Street/O'Farrell Street intersections.

³ The movement or lane for a given phase that requires the most green time is known as the critical movement or critical lane.

Table VI.4: Contribution to Intersection Volumes under 2030 Cumulative Conditions – No Garage Alternative

Intersection	Existing Volume	Project Volume	2030 Volume	Contribution To	
				Total	Growth
1. Fourth/Market	2,282	11	2,842	0.4%	2.0%
5. Fifth/Mission	2,829	75	3,463	2.2%	11.6%
6. Fifth/Howard	3,219	125	3,984	3.1%	16.3%
7. Sixth/Market	2,961	2	3,624	0.1%	0.3%
9. Sixth/Mission	3,482	72	4,300	1.7%	8.8%
10. Fourth/Howard ^a	3,901	139	4,634	3.0%	19.0%
11. Stockton/O'Farrell ^a	2,075	14	2,535	0.6%	3.0%

Notes: **Bold** denotes intersections operating at unacceptable levels under 2030 Cumulative conditions **without** the enforcement of the transit-only lane on Market and Mission Streets.

^a The Cumulative LOS and delay for the additional intersections evaluated as part of the No Garage Alternative analysis are as follows:

10. Fourth/Howard: LOS E (60.5 seconds of delay per vehicle)

11. Stockton/O'Farrell: LOS E (57.3 seconds of delay per vehicle)

Source: AECOM, October 2009

Table VI.5: Contribution to Critical Movements under 2030 Cumulative Conditions – No Garage Alternative

Intersection	Critical Movement ^a	Critical Movement LOS	Vehicle Contribution to Critical Movement	Percent Contribution to Critical Movement
1. Fourth/Market	SBT	F	11	0.7%
	EBT	F	0	0%
5. Fifth/Mission	NBT	F	5	0.5%
	EBT	D	54	7.0%
6. Fifth/Howard	NBT	F	40	4.4%
	WBL/WBT	D	53	3.1%
7. Sixth/Market	NBT	F	2	0.1%
	EBT	D	0	0%
9. Sixth/Mission	SBT	F	0	0%
	EBT	D	54	6.6%
10. Fourth/Howard	SBR	F	63	11.1%
	WBT	D	22	1.4%
11. Stockton/O'Farrell	SBT	D	4	0.3%
	EBT	E	0	0%

Notes:

^a NBT = Northbound Turn; EBT = Eastbound Turn; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right

Source: AECOM, October 2009

At the Fifth Street/Mission Street and Sixth Street/Mission Street intersections, the alternative would contribute 11.6 percent and 8.8 percent, respectively, to the growth in traffic volumes from Existing to 2030 Cumulative Conditions Plus No Garage Alternative. Although the alternative would make a moderate contribution to the growth in traffic volumes, it would only contribute to the poorly-performing critical movements that operate at satisfactory levels (LOS D). Therefore,

traffic generated by the alternative would not represent a cumulatively considerable contribution to the adverse cumulative conditions at the Fifth Street/Mission Street and Sixth Street/Mission Street intersections.

At the Fifth Street/Howard Street intersection, the alternative would contribute 16.3 percent to the growth in volumes between Existing and 2030 Cumulative Plus No Garage Alternative. The alternative would add traffic to all of the critical movements (northbound through, westbound through, and westbound left). The traffic generated by the alternative would not represent a cumulatively considerable contribution to the significant cumulative traffic impact at the Fifth Street/Howard Street intersection, because the No Garage Alternative would not add substantial volumes to the northbound through movement, which determines overall poor operating conditions at this intersection.

At the Fourth Street/Howard Street intersection, the No Garage Alternative would contribute 19.0 percent to the growth in volumes between Existing and 2030 Cumulative conditions. In addition, the alternative would add traffic to both of the critical movements (southbound right and westbound through). The westbound through movement, however, would operate at satisfactory levels (LOS D). Conversely, the southbound right movement would operate at LOS F, and the alternative would add 63 vehicles (about 11 percent) to this critical movement. Therefore, the traffic generated by the alternative would represent a cumulatively considerable contribution to the significant cumulative traffic impact at the Fourth Street/Howard Street intersection because the No Garage Alternative would add vehicles to the southbound right critical movement.

Compared to the 2030 Cumulative Conditions Plus Project, the No Garage Alternative would not generate significant cumulative impacts at the Fifth Street/Stevenson Street or Fifth Street/Mission Street intersections, but would generate one new significant cumulative traffic impact at the Fourth Street/Howard Street intersection. This impact could be mitigated by modifying the traffic signal cycle time from 90 seconds to 80 seconds; intersection operating conditions would improve from LOS E to LOS C. However, the pedestrian scramble signal phase at this intersection would make optimization of signal timing at this location infeasible. Therefore, this impact would remain significant and unavoidable. Thus, the 2030 Cumulative Conditions Plus No Garage Alternative would generate a significant and unavoidable impact at a new location (Fourth Street/Howard Street) and would avoid impacts at two intersections (Fifth Street/Stevenson Street and Fifth Street/Mission Street) when compared to 2030 Cumulative Conditions Plus Project.

Noise

Traffic-related noise impacts were determined to be less than significant for the proposed project. The amount of space devoted to retail use and the number of truck trips to the proposed loading docks on Stevenson Street would be the same under this alternative as with the proposed project. However, with the removal of on-site parking the number of vehicle passbys on Stevenson Street would be reduced, and, as a result, the sensitive receptors (residential uses at the east end of Stevenson Street) would be exposed to less traffic-generated noise.

Air Quality

The amount of building space devoted to retail, the number of vehicle trips to the project vicinity, and the number of truck trips to the proposed loading docks on Stevenson Street would be the same under this alternative as with the proposed project. Since both the proposed project and the alternative would generate the same number of daily vehicle trips, the effects of project-generated traffic on regional air quality emissions under this alternative would be the same as the air quality effects of the proposed project. The transportation study took the conservative approach of assuming that the No Garage Alternative would generate the same number of trips as the proposed project with available parking. However, it should be noted that the No Garage Alternative could potentially discourage driving, resulting in fewer vehicle trips and lower levels of GHGs. However, this would not reduce GHGs from vehicle miles traveled altogether. Therefore, like the proposed project, the No Garage Alternative's impact on GHGs would remain less than significant using the City's significance criteria, and there would be no significant air quality impacts based on existing adopted BAAQMD thresholds.

The approach to the analysis of this alternative was conservative, as described earlier, thus it would not alter any of the GHG emitting activities of the proposed project. If the proposed new GHG significance threshold for operational-related emissions, circulated in the September and October 2009 BAAQMD *CEQA Guidelines Update* documents. In addition, the No Garage Alternative would result in similar exceedances of ROG as the proposed project. These would be mitigated through the implementation of Mitigation Measure AQ-2 – Use of Low-VOC Architectural Coatings. Therefore, for all of the reason discussed above, the No Garage Alternative would have a significant unavoidable impact on climate change much like the proposed project under the proposed BAAQMD significance criteria.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. *CEQA Guidelines* require that an environmentally superior alternative be designed and states that “if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Below is a discussion regarding the factors utilized to determine the environmentally superior alternative for this project based on the results of the evaluation of the Reduced Intensity Alternative as compared with the No Garage Alternative in this chapter.

Air Quality

With respect to air quality, both the Reduced Intensity Alternative and the No Garage Alternative would have a significant impact on global climate change if the proposed new thresholds in the BAAQMD *CEQA Guidelines Update* were adopted in their current form. It can reasonably be assumed that for both of these alternatives the contribution to GHG emissions would be less than from the proposed project. However, when comparing both alternatives with one another, it is unknown which would have fewer GHG impacts, the No Garage Alternative or the Reduced Intensity Alternative.

Building Energy Use

While the Reduced Intensity Alternative would be a smaller development on the project site and would require less energy for heating and likely less water use and energy associated with the transport of water, the Reduced Intensity Alternative would accommodate fewer retailers (two to three) than the proposed project or the No Garage Alternative (likely five or six). The two to three retailers that would not occupy the smaller development project site would need to find facilities elsewhere in San Francisco or in the Bay Area region. The remaining two to three retailers would occupy building space of similar size. If the building space occupied by the retailers not accommodated at the project site is a new building with updated energy and water efficiencies incorporated into it, then overall energy use resulting from the Reduced Intensity Alternative and the energy use associated with the buildings occupied by the relocated retailers would be similar to that with the No Garage Alternative. However, if these two to three retailers relocate to older buildings without energy and water upgrades, or to jurisdictions without mandatory green building requirements, then the Reduced Intensity Alternative could result in an overall increase in cumulative energy use and the respective GHG emissions.

Similarly, if the two to three retailers not accommodated by a Reduced Intensity Alternative are forced to relocate to other places in San Francisco or in the San Francisco Bay Area, where regional and local transit service is less effective and / or less available than at the project site, the Reduced Intensity Alternative could increase regional vehicle miles traveled (VMTs) incrementally, and thereby, incrementally increase regional GHG emissions.

Transportation-Related Emissions

As has been previously stated, the reduced size of the Reduced Intensity Alternative would result in fewer daily vehicle trips. However, while the *Transportation Study* for this project took the conservative approach of assuming that the No Garage Alternative would generate the same number of vehicle trips as the proposed project with available parking, it should be noted that the No Garage Alternative could potentially discourage driving, resulting in fewer vehicle trips and lower levels of GHGs. Limiting or eliminating vehicular parking has been identified as a feasible measure to reduce project vehicle trips by state and local agencies. Trip reductions that may result from this type of measure may be on the order of between one to thirty percent.^{4,5}

Construction-Related Impacts

With respect to construction-related impacts, the No Garage Alternative would require less excavation and soils disturbance of the project site than the Reduced Intensity Alternative. This would minimize disruption in the project vicinity since the period of time needed to contain construction activities to the project site would likely be shortened.

Transportation and Circulation

Both the No Garage Alternative and the Reduced Intensity Alternative would decrease significant project-specific and 2030 cumulative traffic impacts. Both would continue to experience traffic impacts related to loading activities and would require implementation of Mitigation Measure M-TR-2 to limit loading from project-related trucks longer than 30 feet to nighttime hours (10:00 PM to 6:00 AM). While neither alternative would result in a significant impact at the intersection of Fifth Street and Stevenson Street, the Reduced Intensity Alternative would result in increased traffic on Stevenson Street when compared with the No Garage Alternative, and therefore, create the potential for increased conflicts with pedestrians. These potential effects would be less with the No Garage Alternative since, aside from delivery truck traffic, the vehicle traffic would be limited to retail customer pick-up and returns.

⁴ Dierkers et al. 2007. *CCAP Transportation Emissions Guidebook*. Online at <http://www.ccap.org/safe/guidebook.php>. Accessed October 28, 2009.

⁵ Sacramento Metropolitan Air Quality Management District. 2007. *Recommended Guidance for Land Use Emission Reductions*. Online at <http://www.airquality.org/ceqa/GuidanceLUEmissionReductions.pdf>. Accessed October 29, 2009.

In addition, both alternatives would contribute to a significant cumulative traffic impact under 2030 cumulative conditions. For the Reduced Intensity Alternative, a significant impact would occur at the intersection of Fifth Street and Mission Street. Intersection operation would deteriorate from LOS C to LOS E, and the Reduced Intensity Alternative would contribute to the southbound through critical movement. For the No Garage Alternative, a significant impact would occur at the intersection of Fourth Street and Howard Street. Intersection operation would deteriorate from LOS D to LOS E, and the No Garage Alternative would contribute to the increased delay at the southbound right critical movement. Therefore, the deterioration in the LOS at Fifth Street and Mission Street as a result of the Reduced Intensity Alternative would be of greater magnitude than that at Fourth Street and Howard Street as a result of the No Garage Alternative.

Since the extent of interface with transit volume moving through the Fifth Street and Mission Street intersection during the PM peak hour would be greater than that at the Fourth Street and Howard Street intersection, the adverse effects to transit would likely be greater at the Fifth Street and Mission Street intersection.

With respect to pedestrian conditions, Fourth Street is part of the Citywide Pedestrian Network at its intersection with Howard Street. Mission Street is also part of the Citywide Pedestrian Network at its intersection with Fifth Street. As discussed in the transportation study with respect to pedestrian conditions, deteriorating intersection operations would likely have a greater effect at Fifth Street and Mission Street due to the intersection's proximity to more congested pedestrian conditions as one moves north toward Market Street.

Therefore, for the reasons given above, the No Garage Alternative would be considered the environmentally superior alternative to the proposed project.

VII. REPORT PREPARERS AND PERSONS CONSULTED

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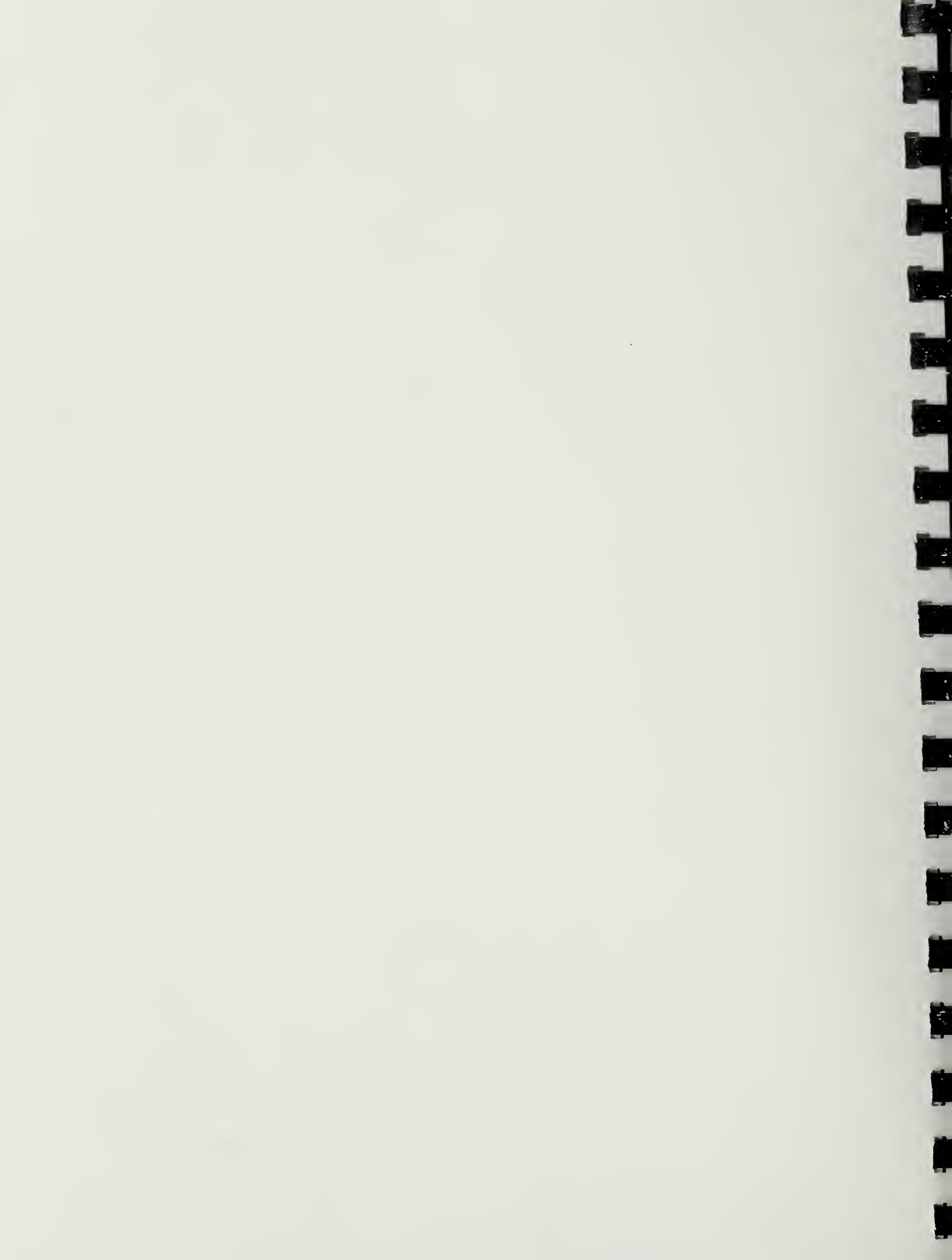
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APPENDIX A. NOTICE OF PREPARATION AND INITIAL STUDY





SAN FRANCISCO PLANNING DEPARTMENT

To Responsible Agencies, Trustee Agencies, and Interested Parties:

RE: CASE NO. 2005.1074E – CityPlace (935-965 Market Street)

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

1650 Mission St
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

The San Francisco Planning Department has issued a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project. An Initial Study has also been prepared to provide more detailed information regarding the proposed project and the environmental issues to be considered in the Draft EIR. The NOP/Initial Study is either attached or is available upon request from Nannie Turrell, at (415) 575-9047 or at the above address. The NOP/Initial Study is also available on-line at www.sfplanning.org/inea. This notice is being sent to you because you have been identified as potentially having an interest in the project or the project area.

Project Description: The approximately 1.06-acre project site is on Assessor's Block 3704, Lots 71, 72, and 73. It is located mid-block on the south side of Market Street between Fifth and Sixth Streets; Stevenson Street forms the southern boundary of the site. The three commercial buildings on the project site contain a total of about 186,400 gross square feet (gsf). The two buildings at 935-939 Market Street and 941-945 Market Street are partly vacant, and 947-965 Market Street is entirely vacant. The proposed project would demolish these three two- to five-story buildings and redevelop the site with one five-story, 90-foot-tall retail building, with associated building services, and parking. The proposed building would include seven levels of retail space including a mezzanine and subsurface level and two subsurface levels of parking. A loading area and a vehicular driveway would be provided on the ground floor; and a mechanical penthouse, including rooftop equipment, would be provided above the fifth floor. Overall, the proposed project would involve construction of an approximately 376,620-gsf building, with about 262,180 gsf of retail uses; about 3,920 gsf of common areas; about 11,700 gsf of mechanical and storage space; and about 98,820 gsf of parking, loading, and driveways and maneuvering space. The project would result in an increase of about 190,220 gsf of developed space on the project site. The project site is in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Zoning Districts, and the 120-X Height and Bulk District. The project would include the use of transferable development rights (TDRs) subject to applicable height and bulk limitations. The project would require a Conditional Use authorization for parking in addition to permitted accessory parking, and for demolition of a prior theater use; variances for the width of the loading and parking access on Stevenson Street, and review by the Planning Commission and consideration of an exception to freight loading requirements under Planning Code Section 309.

The Planning Department has determined that an EIR must be prepared for the proposed project prior to any final decision regarding project approval. The purpose of the EIR is to provide information about potential significant physical environmental effects of the proposed project, to identify ways to minimize significant effects, and to describe and analyze possible alternatives to the proposed project. Preparation of an NOP or EIR does not indicate a decision by the City to approve or to disapprove the project. However, prior to making any decision, the decision makers must consider the information contained in the EIR.

Written comments on the scope of the EIR will be accepted until the close of business, **October 31, 2008** and should be sent to Bill Wycko, Acting Environmental Review Officer, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for an agency that is a Responsible or a Trustee Agency, we need to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of the contact person for your agency.

If you have questions concerning environmental review of the proposed project, please contact Nannie Turrell at (415) 575-9047.



SAN FRANCISCO PLANNING DEPARTMENT

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

1650 Mission St
Suite 400
San Francisco,
CA 94103-2479

Reception:
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Date of this Notice:	October 1, 2008
Lead Agency:	San Francisco Planning Department 1650 Mission Street, 4 th Floor, San Francisco, CA 94103-2479
Agency Contact Person:	Nannie Turrell Telephone: (415) 575-9047
Project Title:	Case No. 2005.1074E CityPlace (935-965 Market Street)
Project Sponsor:	Urban Realty Co., Inc.
Project Contact Person:	David Rhoades Telephone: (415) 814-8000
Project Address:	935-965 Market Street
City and County:	San Francisco
Assessor's Block and Lot:	Assessor's Block 3704, Lots 71, 72, and 73
Zoning District:	C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail)
Height and Bulk District:	120-X
Project Description:	The approximately 1.06-acre project site is on Assessor's Block 3704, Lots 71, 72, and 73. It is located on the south side of Market Street between Fifth and Sixth Streets. The proposed project would demolish the three two- to five-story buildings on the site and redevelop the site with one five-story, 90-foot-tall retail building, with associated building services and subsurface parking. Overall, the building would contain approximately 376,620 gsf, with about 262,180 gsf of retail uses; about 3,920 gsf of common areas; about 11,700 gsf of mechanical and storage space; and about 98,820 gsf of parking, loading, and driveways and maneuvering space. The project would result in an increase of about 190,220 gsf of developed space on the project site. The project site is in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Zoning Districts, and the 120-X Height and Bulk District. The project would include the use of transferable development rights (TDRs) subject to applicable height and bulk limitations. The project would require a Conditional Use authorization for parking in addition to permitted accessory parking and for demolition of a former theater use; variances for the width of the loading and parking access on Stevenson Street, and an exception to freight loading requirements under Planning Code Section 309.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT. AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance) and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

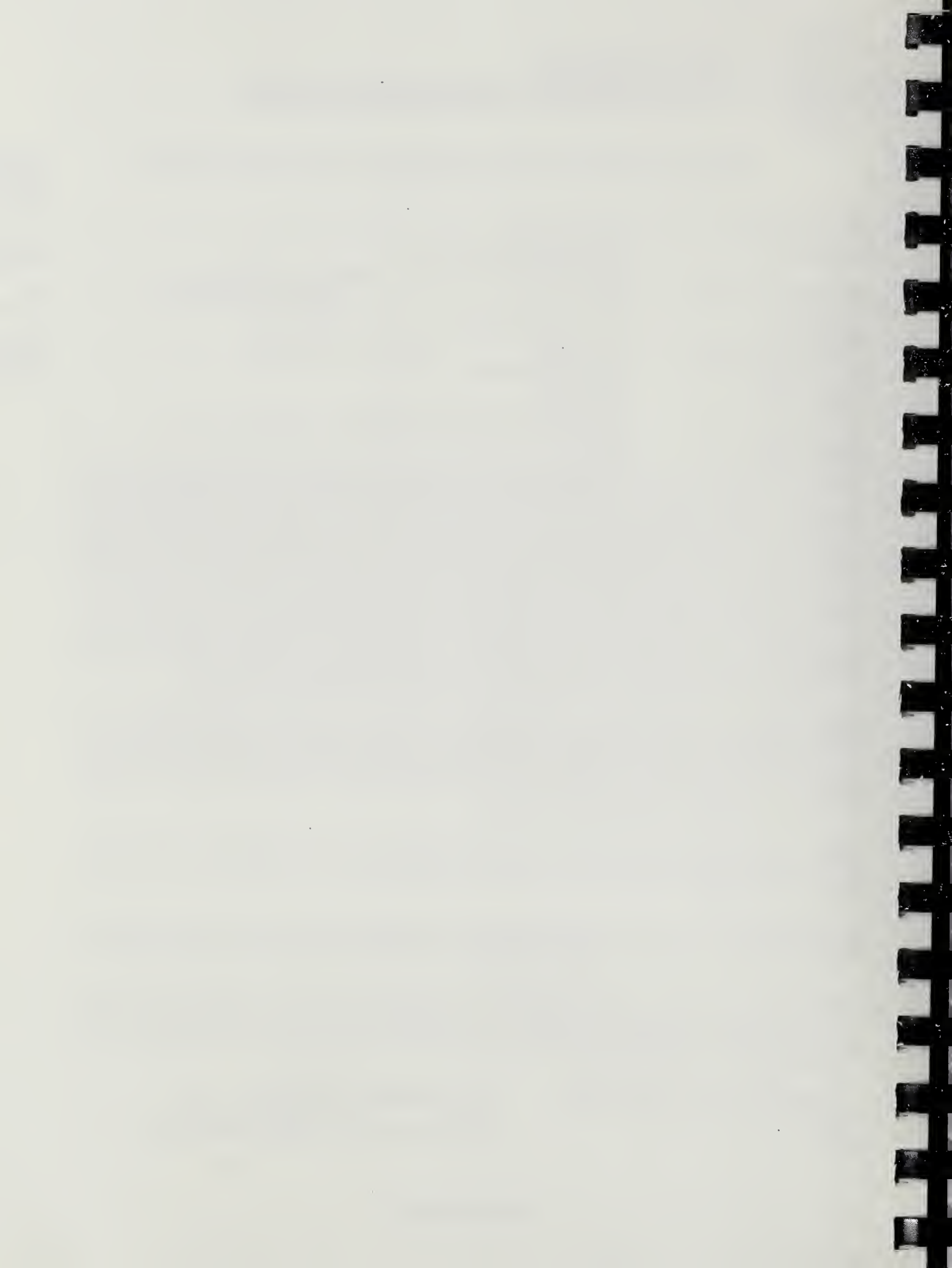
Written comments on the scope of the EIR will be accepted until the close of business on **October 31, 2008**. Written comments should be sent to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

Documents relating to the proposed project are available for review, by appointment, at the Planning Department's Major Environmental Analysis office, 1650 Mission Street, Suite 400. Please call Nannie Turrell at (415) 575-9047.

State Agencies: We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

September 29, 2008
Date

Bill Wycko
Bill Wycko, Acting Environmental Review Officer



INITIAL STUDY
CITYPLACE: 935-965 MARKET STREET
Case No. 2005.1074E – Retail Development

A. PROJECT DESCRIPTION

The approximately 1.06-acre project site (Assessor's Block 3704, Lots 71, 72, and 73) is located in downtown San Francisco on the south side of Market Street between Fifth and Sixth Streets.¹ (See Figure 1: Project Location.) The rectangular site is in the middle of the block, opposite the intersection of Market with Turk and Mason Streets. Stevenson Street forms the southern boundary of the site. The site encompasses three parcels: 935-939 Market, 941-945 Market, and 947-965 Market. These parcels are developed with three mixed-use commercial and office buildings: 935-939 Market Street and 941-945 Market Street, which are partly vacant, and 947-965 Market Street, which is entirely vacant. The three buildings on the project site contain approximately 186,400 gross square feet (gsf).

The project sponsor proposes to demolish the three existing two- to five-story buildings and redevelop the site with one five-story, approximately 90-foot-tall commercial building, with new retail uses, associated building services, and a below-grade parking garage with 210 off-street parking spaces. The proposed building would include seven levels of retail space, including a mezzanine and subsurface level (floor B1) and two subsurface levels (floors B2 and B3) of parking. Building services would occupy a small portion of all above- and below-ground floors; a loading area and a vehicular driveway would be provided on the ground floor; and a mechanical penthouse, including rooftop equipment, would be provided above the fifth floor. The proposed project at 935-965 Market Street (named "CityPlace" by the sponsor) would involve the construction of an approximately 376,620-gsf building, with approximately 262,180 gsf of retail uses; about 3,920 gsf of common areas such as the ground-floor lobby; about 11,700 gsf of mechanical and storage space; and about 98,820 gsf of parking, loading, and driveways and maneuvering space.² The project would result in an increase of about 190,220 gsf of developed space on the project site.

¹ Market Street is oriented in a northeast-southwest direction, but for ease of understanding, it will be referred to as an east-west road in this report.

² The project includes 81,180 gsf of parking areas. Approximately 21,580 gsf of the parking area would be accessory parking; the remaining gsf (approximately 59,600 gsf) would be non-accessory parking. According to *Planning Code* Section 204.5, off-street parking is accessory if it is (1) located on the same lot as the development it serves; and (2) used by the occupants of the development to which it is accessory. Accessory parking facilities may not exceed the following parking amounts: (1) 150 percent of the required number of spaces where three or more spaces are required; and (2) 15 spaces or seven percent of the total gross floor area of the development, whichever is greater. Off-street parking which exceeds the code-specified accessory parking amounts is considered to be non-accessory parking. Projects require Conditional Use authorization (CU) for provision of non-accessory parking.



SOURCE: Turnstone Consulting, Gensler

FIGURE 1: PROJECT LOCATION

The project site is in the C-3-G (Downtown General Commercial) and C-3-R (Downtown Retail) Zoning Districts, and the 120-X Height and Bulk District. Both the C-3-G and C-3-R Zoning Districts permit a base floor area ratio (FAR) of 6:1. A maximum FAR of 9:1 is allowable with the use of transferable development rights (TDRs) and subject to applicable height and bulk limitations. The total gross floor area of the proposed project attributable to FAR is approximately 371,398 gsf,³ or 8.1 FAR, which is more than the base FAR floor area of 276,378 gsf and less than the allowable 9:1 gross floor area of 414,567 gsf.⁴ Therefore, the project would include TDRs. The amount of TDR space necessary for the proposed project could range from approximately 48,957 gsf to approximately 95,020 gsf, depending on the determination as to the applicability of *Planning Code* Section 102.9(b).

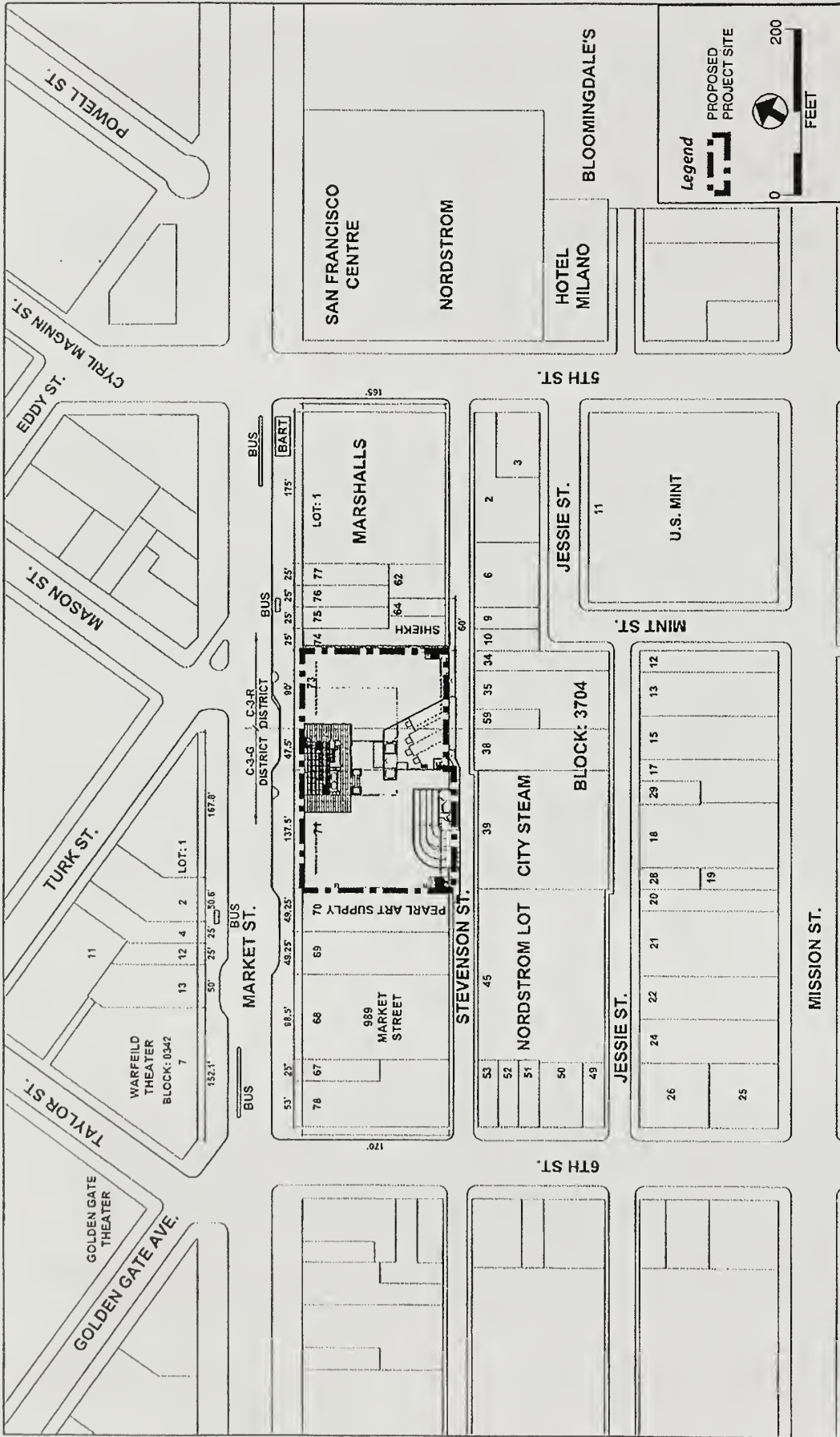
Proposed Project Design

The proposed building would rise five stories, plus a mezzanine, to a total height of about 90 feet above street level; in addition, the building would have an enclosed 16-foot-tall mechanical penthouse. The proposed building would also include three subsurface levels. The subsurface levels B1 and B2 and all above-ground levels would be built to the property lines on all sides of the building; subsurface level B3 would have about 6,315 square feet (sq. ft.) of unexcavated area at the southern end of the building. (See Figure 2: Proposed Site Plan; Figure 3: Proposed Building Sections; Figure 4: Proposed Elevation, Market Street; and Figure 5: Proposed Elevation, Stevenson Street.) The proposed design would be contemporary in style, with the building's Market Street façade articulated with a varied glass curtain wall system.⁵ The building's Stevenson Street façade would be sheathed in a painted aluminum curtain wall system; this façade would be less articulated than the main Market Street façade. The mechanical penthouse level would also be sheathed in painted aluminum cladding on all sides. The ground-floor retail storefronts along Market Street would have clear glazing to maximize light and transparency.

³ Approximately 46,063 gsf is added to the building square footage for purposes of the FAR calculation, to reflect an average floor height in excess of 15 feet. Approximately 60,912 gsf is excluded from the FAR calculation, under *Planning Code* Section 102.9(b). This excluded space includes the following: accessory parking spaces and aisles; accessory loading spaces; driveway and maneuvering areas; storage; building and pedestrian circulation on the first floor; mechanical areas segregated from occupied floors; roof-level mechanical equipment; the atrium; and the unexcavated area on floor B3. The floor area devoted to non-accessory parking is included in the FAR calculations, as required.

⁴ The base allowable floor area for the project equals the lot area (46,063 sq. ft.) times 6, which is 276,378 gsf. The maximum allowable gross floor area for the project equals the lot area (46,063 sq. ft.) times 9, which is 414,567 gsf.

⁵ Gensler is the project architect.

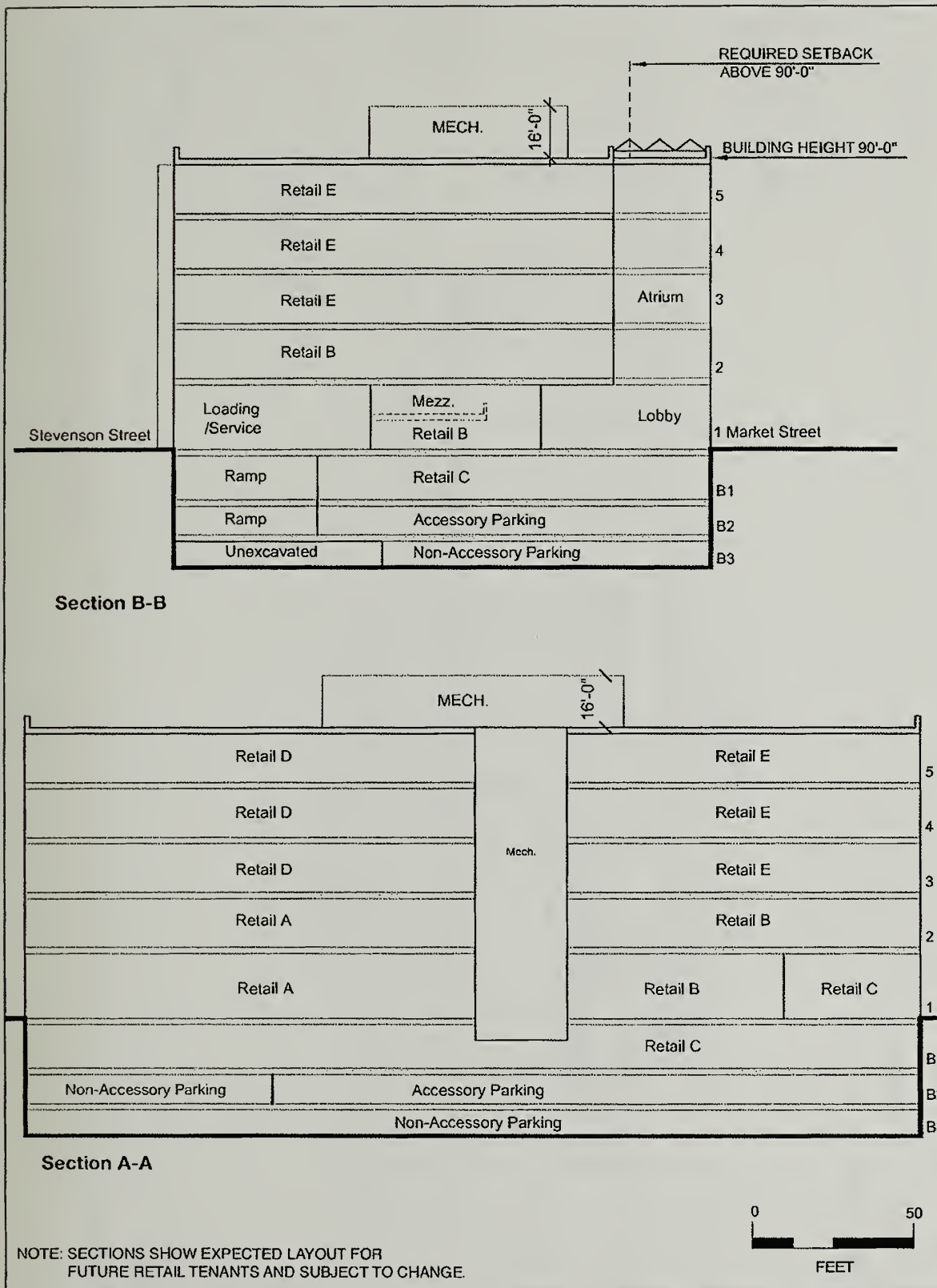


SOURCE: Gensler, Turnstone Consulting

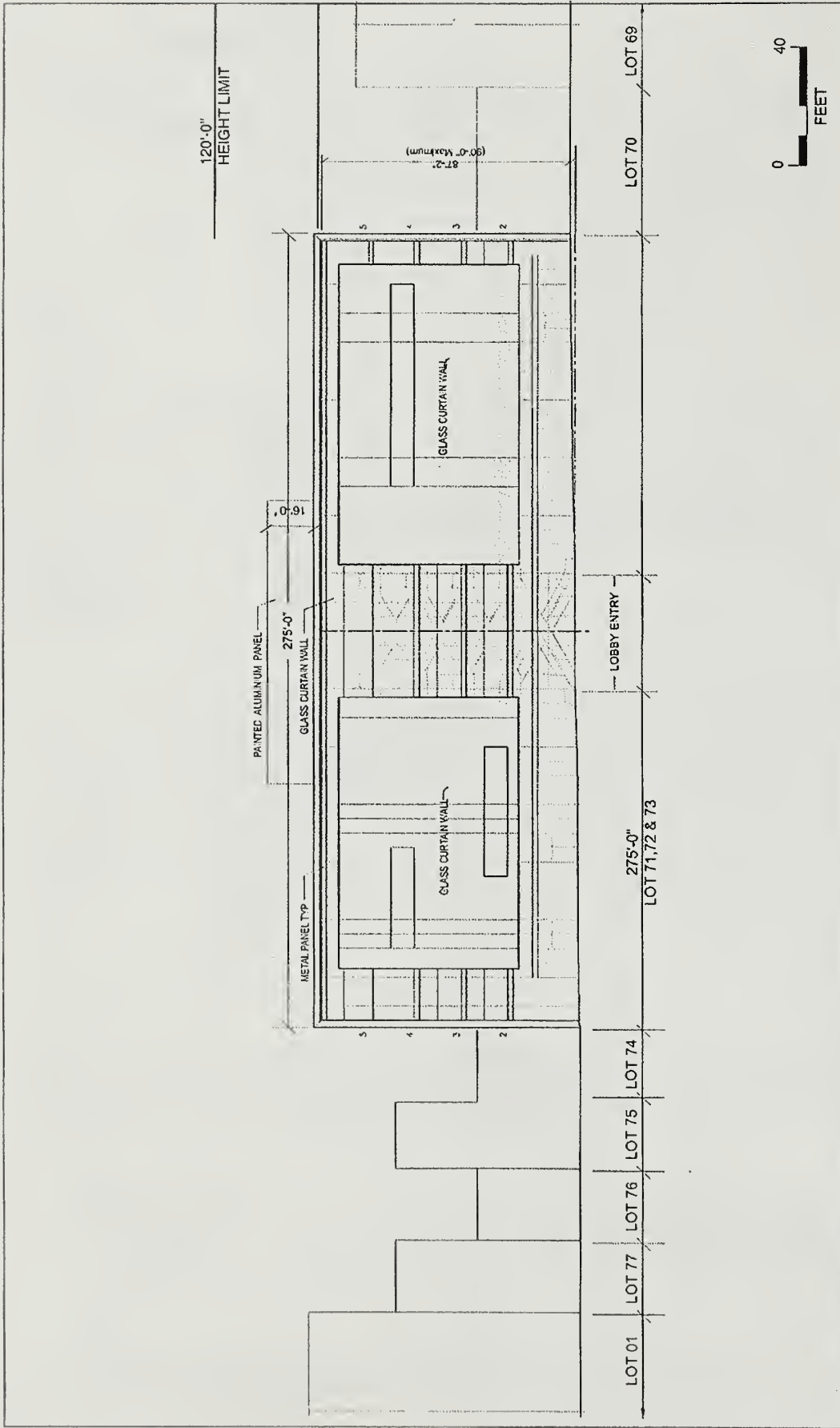
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FIGURE 2: PROPOSED SITE PLAN



SOURCE: Gensler, Turnstone Consulting

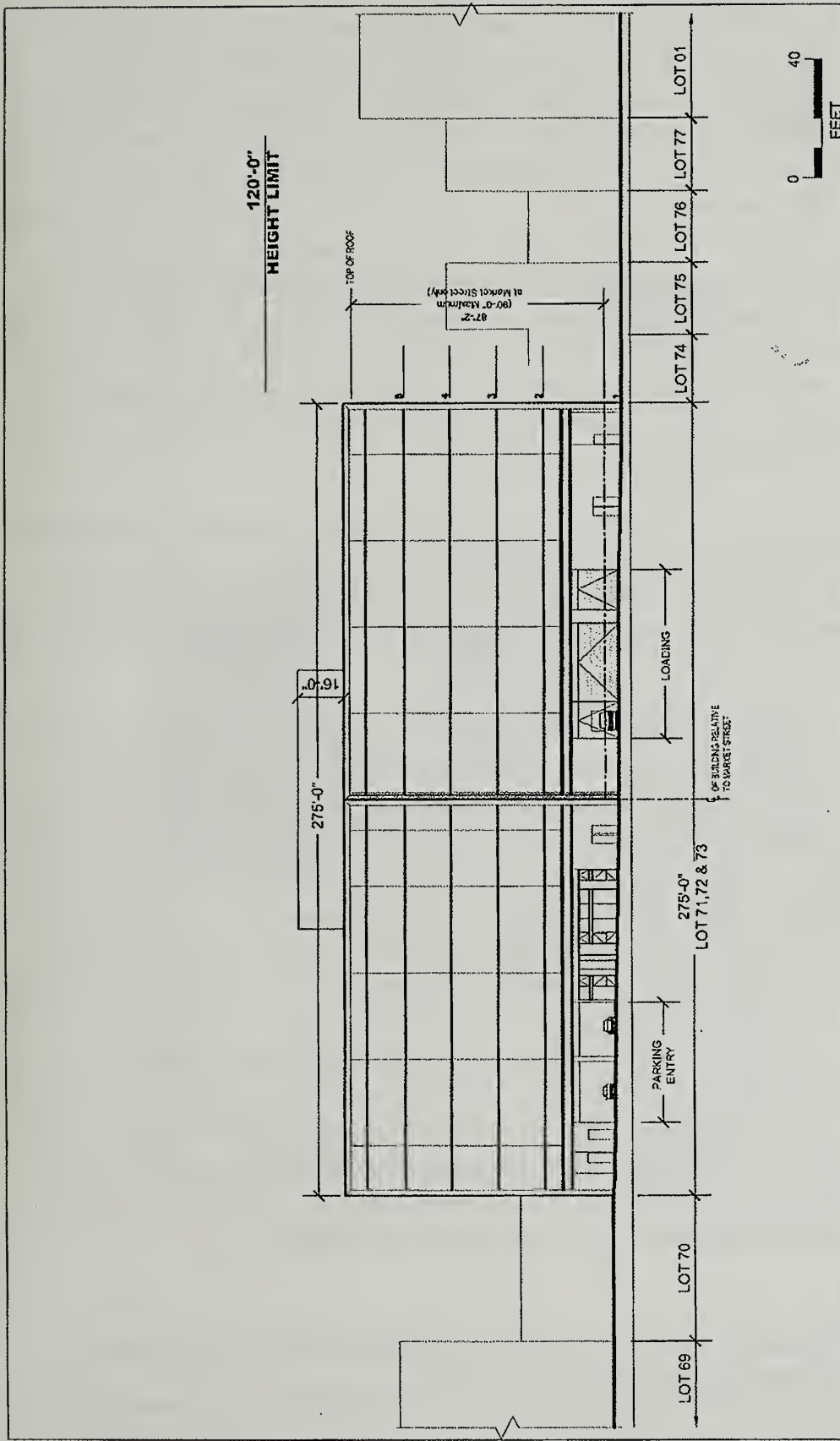


SOURCE: Gensler, Turnstone Consulting

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FIGURE 4: PROPOSED ELEVATION, MARKET STREET



SOURCE: Gensler, TumsStone Consulting

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2005.1074E

FIGURE 5: PROPOSED ELEVATION, STEVENSON STREET

The Market Street façade would include a centrally located main entrance with four sets of double doors opening on to the Market Street sidewalk. The main entrance would lead to a common five-level atrium with an escalator, the main stairs, and elevators. The common atrium would connect directly to two of the ground-floor retail spaces (Retail Spaces A and B, shown on Figure 6: Proposed Ground Floor Plan), and would provide access to the other retail levels and parking levels via a combination of elevators, stairs, and escalator.⁶ In addition, the Market Street façade would include three secondary entrances, which would lead directly from the Market Street sidewalk to individual ground-floor retail spaces (Retail Spaces A, B, and C, shown on Figure 6). Two of these direct retail entrances at the ground floor would be located in the eastern portion of the proposed building, and one would be located in the western portion. The project's vehicular and loading area driveways would be located along Stevenson Street. Additionally, commercial entrances would be provided from the Stevenson Street sidewalk. The ground-floor design shows five entrances along Stevenson Street.⁷

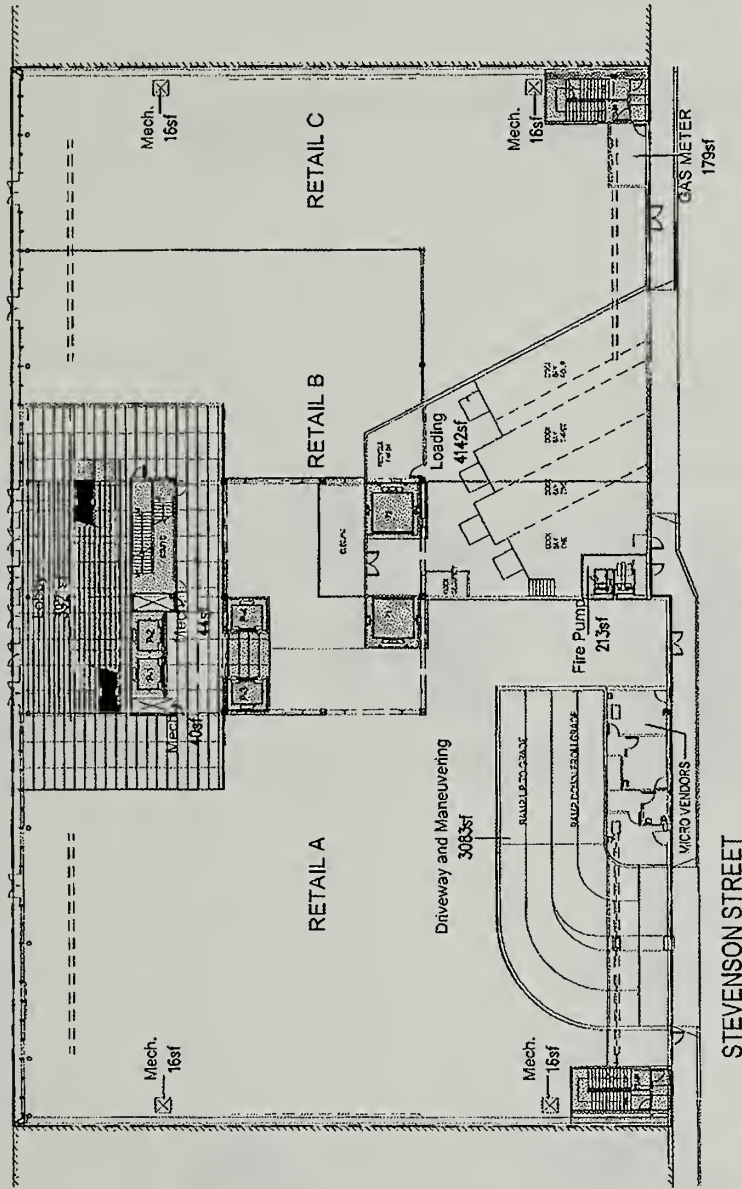
The Stevenson Street frontage would also provide access to an area reserved for "microvendors," small businesses that would typically operate on the street (e.g., a flower kiosk or newspaper stand). The microvendor area would be approximately 670 gsf, and would include space and separate entrances for three vendors. The microvendor area would be located next to the parking garage entrance.

The 24-foot-tall ground level and mezzanine of the proposed building would have approximately 44,620 gsf of retail space, with about 34,380 gsf on the ground level and 10,240 gsf on the mezzanine. The project sponsor anticipates that the proposed retail space would include multiple tenant spaces; currently, it is anticipated that the proposed building would be divided among up to five retail tenants. (See Figure 6 and Figure 7: Proposed Mezzanine Plan.) The proposed retail space may also include a café. All of the ground-level retail spaces would have individual street access directly from the Market Street sidewalk (see Figure 4: Proposed Elevation, Market Street, p. 6). Some of the ground-level retail spaces may also have individual street access from the Stevenson Street sidewalk (see Figure 5: Proposed Elevation, Stevenson Street, p. 7). Currently, it is anticipated that the second level would be designed to accommodate one retail tenant and that the third, fourth, and fifth levels of the proposed building would be occupied by up to two retail tenants per floor. (See Figure 8: Proposed Floor Plan (Typical Retail Floor).) The first basement level (B1) would be designed to accommodate one retail tenant. (See Figure 9: Proposed First Basement Floor (B1) Plan.) It is possible that all of the multi-level retail spaces in the proposed building would have their own dedicated escalators and elevators.

⁶ Current building plans show that five retail tenants are expected to occupy the proposed building; however, this arrangement is subject to change in the future.

⁷ Two of the Stevenson Street entrances would connect directly to stairs leading to the proposed building's upper levels.

MARKET STREET

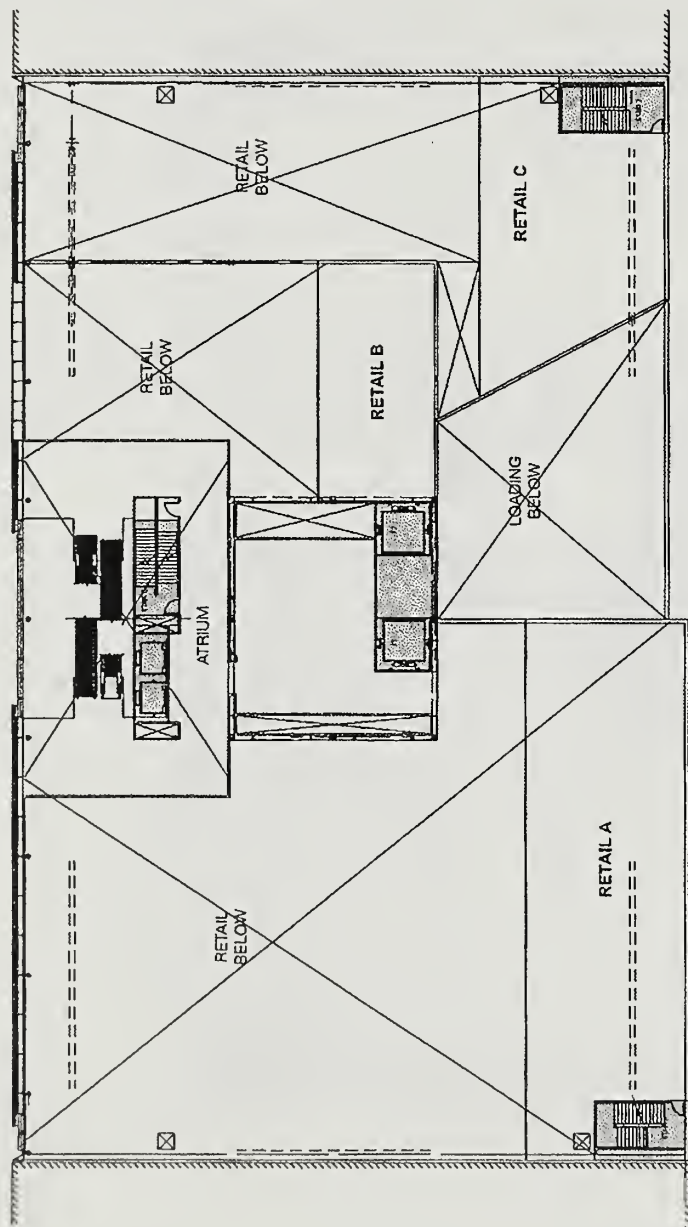


SOURCE: Gensler, Turnstone Consulting

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FIGURE 6: PROPOSED GROUND FLOOR PLAN

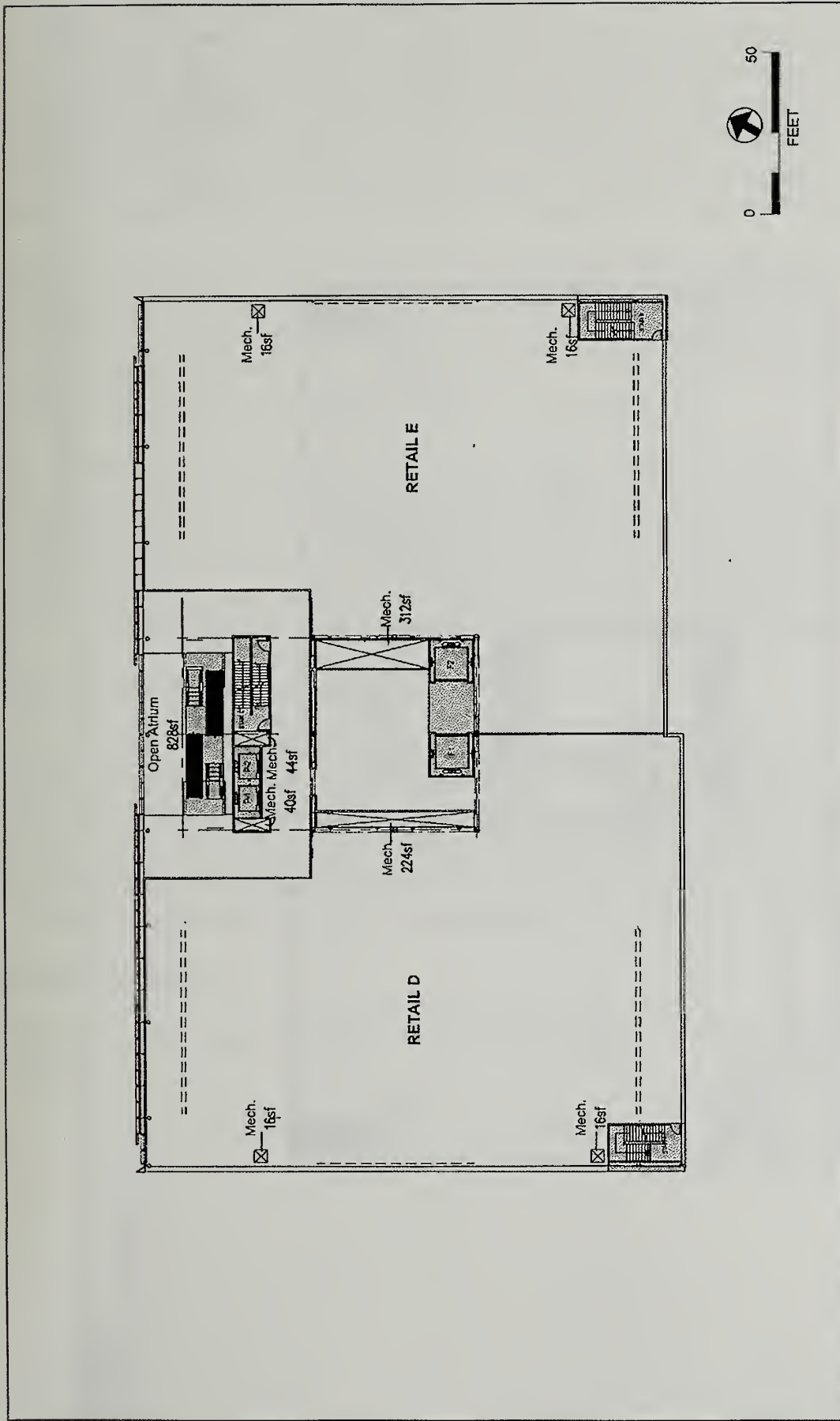


SOURCE: Gensler, Turnstone Consulting

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FIGURE 7: PROPOSED MEZZANINE PLAN

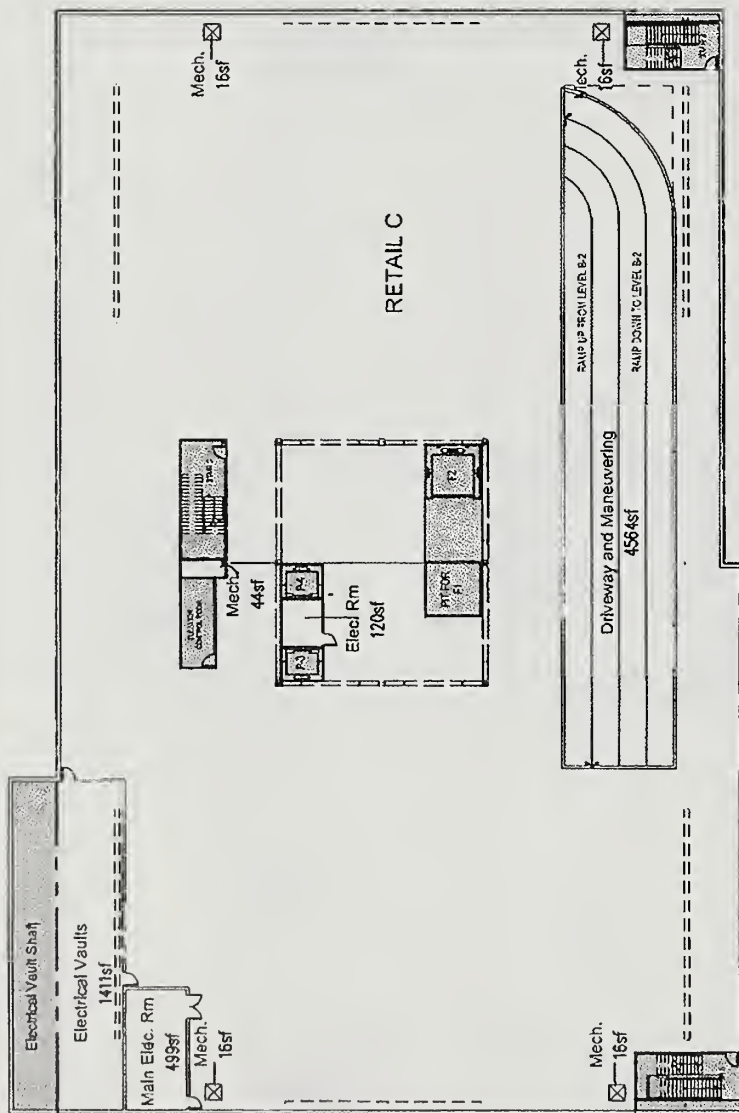


SOURCE: Gensler, Turnstone Consulting

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FIGURE 8: PROPOSED TYPICAL RETAIL FLOOR PLAN



SOURCE: Gensler, Turnstone Consulting

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FIGURE 9: PROPOSED FIRST BASEMENT FLOOR (B1) PLAN

In addition to retail uses, the ground level would be occupied by an approximately 3,920-gsf atrium lobby with elevators, escalators, and stairs; approximately 540 gsf of mechanical and storage space; an approximately 4,140-gsf, four-stall loading area; and an approximately 3,085-gsf parking garage driveway along Stevenson Street. The pedestrian entrance to the atrium lobby would be from Market Street. The parking garage driveway entrance/exit and loading stalls would be located at the rear of the building and would be accessible from Stevenson Street.

Floors 2 through 5, the mezzanine, and floor B1 would be entirely retail in use and would be connected by stairs, escalators and elevators to the ground-level retail floor. Floors 2 through 5 would each have approximately 44,550 gsf of retail space, and the subsurface retail level would have approximately 39,360 gsf of retail space. Part of floor B1 (approximately 4,565 gsf of space) would be used for the ramps leading to and from the parking garage.

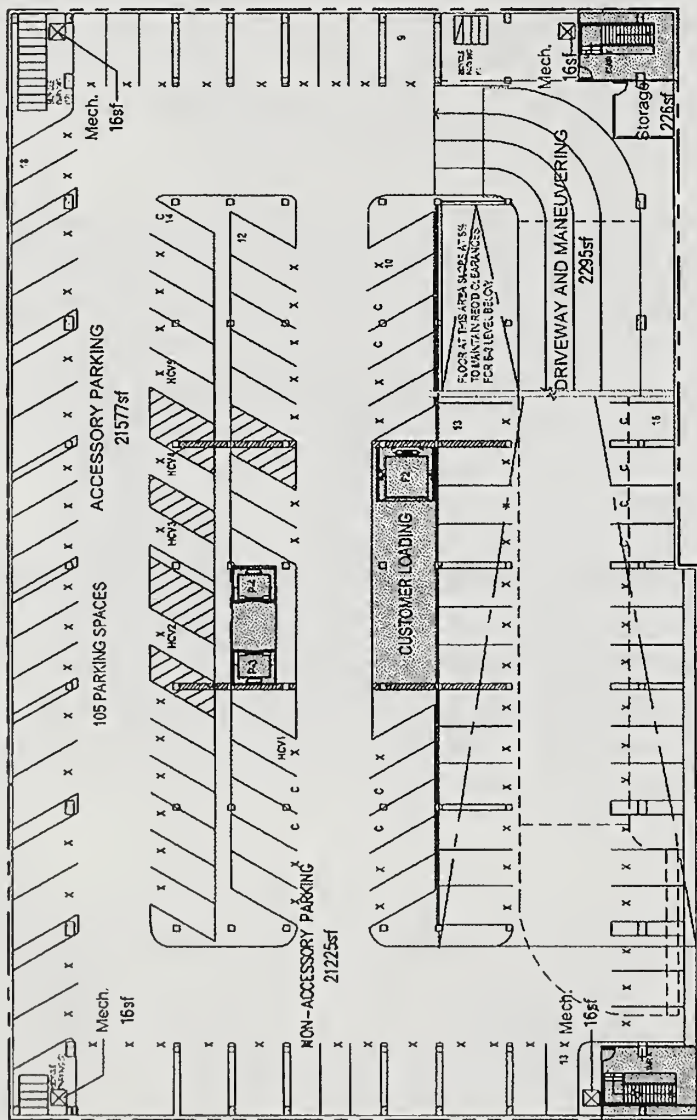
Two of the three subsurface levels (floors B2 and B3) would be occupied by a parking garage. (See Figure 10: Proposed Second Basement Floor (B2) Plan, and Figure 11: Proposed Third Basement Floor (B3) Plan.) The parking garage would provide approximately 210 independently accessible retail parking spaces; with valet parking, the garage would accommodate up to approximately 295 vehicles. Approximately 21 bicycle parking spaces would be provided on floor B2. A portion of floor B3 (approximately 6,315 sq. ft.) would remain unexcavated.

Access, Site Circulation, and Loading

Vehicular access to the parking garage would be via a two-way ramp from Stevenson Street, which is currently one-way eastbound. Pedestrians would access the building from the common atrium lobby and the individual retail space entrances along Market Street. There may be street-level access from Stevenson Street to one or more of the ground-level retail spaces. The proposed loading area would include three full-size spaces for trucks and one smaller space for a van, and would be accessed directly from Stevenson Street.

Proposed Landscaping

The sponsor would retain the existing street trees along Market Street. No other landscaping is planned.

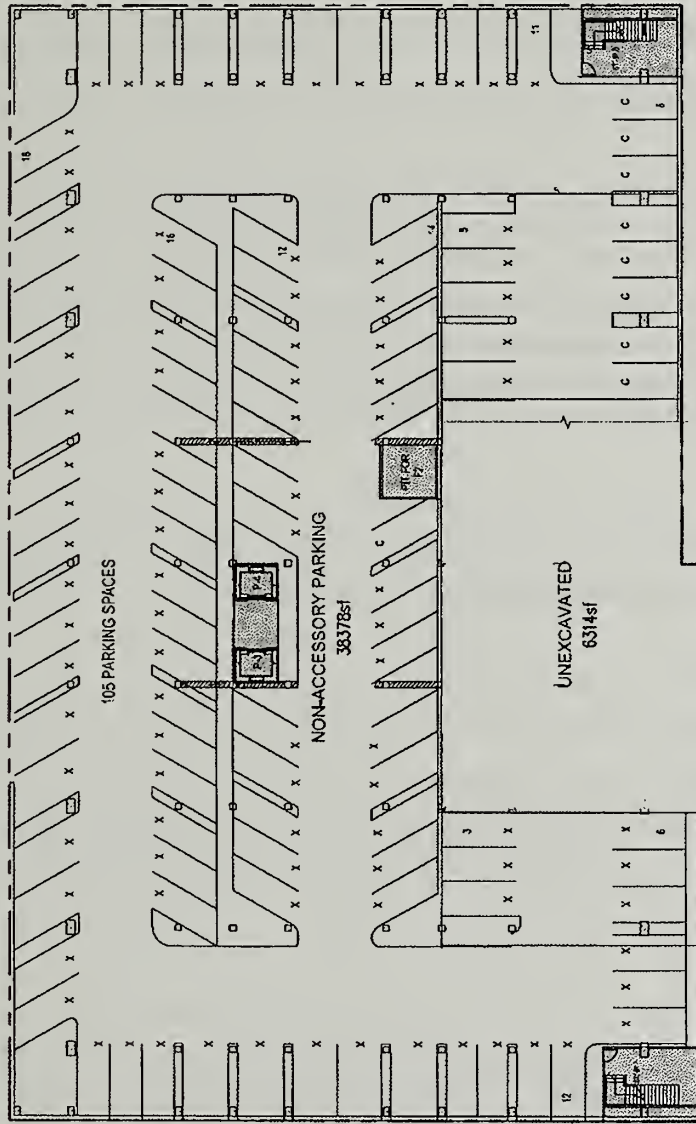


SOURCE: Gensler, Turnstone Consulting

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2005.1074E

FIGURE 10: PROPOSED SECOND BASEMENT FLOOR (B2) PLAN



SOURCE: Gensler, Turnstone Consulting

CITYPLACE

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FIGURE 11: PROPOSED THIRD BASEMENT FLOOR (B3) PLAN

Foundation and Earthwork

The project would use a mat foundation. Proposed excavation would be up to about 41 feet deep⁸ (about 31 feet deeper than the existing basement). Approximately 50,500 cubic yards of soil would be removed from the site; however, approximately 6,315 sq. ft. would remain unexcavated at the B3 level.

Relocation of Existing Tenants

Recent tenants of 935-939 Market Street have included retail, government, institutional, and office uses. Four of these tenants have recently vacated the building. The remaining tenant, the Asian Law Caucus, is still in occupancy; however, they have firm plans to move. The Asian Law Caucus will be relocating to its new facilities at 53 Columbus Street in early fall 2008. The project sponsor has acquired an office building at 980-984 Mission Street and has retrofitted the building for University of California, San Francisco (UCSF) Citywide Case Management and Community Focus, which relocated there. The Social Security Administration (SSA) moved into the new Federal Building at the intersection of Seventh and Mission Streets. With the exception of SSA, the sponsor has assisted all of the tenants through rent subsidies, architectural services, and/or other forms of assistance.

One tenant, a retail use, remains at 941-945 Market Street. The project sponsor is in discussions with the tenant regarding its future space and location requirements. As noted previously, 947-965 Market Street is completely vacant.

Project Schedule

The project sponsor, Urban Realty Co., Inc., estimates that construction of the proposed project would take approximately 25 months, including six months for demolition, excavation, and shoring activities. The project architect is Gensler and the estimated construction cost is approximately \$75 million. If approved, project construction is anticipated to start in spring 2009.

Required Approvals

- The proposed project is located in a C-3 District and would be subject to *Planning Code* Section 309, Permit Review in C-3 Districts. The project sponsor would request the following exception under Section 309:
 - An exception to the requirements for freight loading spaces. (Sections 152.1, 161(i), and 309(a)(8))

⁸ Approximately 37 feet would be for the three subsurface levels, plus four feet for foundations.

- The proposed project would require conditional use authorization for retail parking that is in addition to the amount permitted as accessory. (Sections 157, 158, 223(m), 204.5)
- The proposed project would require conditional use authorization for demolition of a prior theater use. (Section 221.1)
- The proposed project would require a variance from the requirement of Section 155(s)(5)(A) limiting a project to two façade openings of no more than 11 feet wide or one opening of no more than 22 feet wide for access to off-street parking.
- The proposed project would require a variance from the requirement of Section 155(s)(5)(A) limiting a project to one façade opening of no more than 15 feet wide for access to off-street loading.
- The proposed project would require the merger of existing lots by the San Francisco Department of Public Works.
- Shadows cast by the proposed 90-foot-tall building would require review under *Planning Code* Section 295 – Height Restrictions on Structures Shadowing Property under the Jurisdiction of the Recreation and Park Commission.
- The proposed building would exceed the base floor area ratio (FAR) of 6:1. Therefore, the proposed project would require approval by the Zoning Administrator for the transfer of development rights (TDRs), in accordance with the specific conditions of approval under *Planning Code* Section 128 - Transfer of Development Rights in C-3 Districts.

B. PROJECT SETTING

The three existing buildings on the project site contain approximately 186,400 gsf, including approximately 11,900 gsf of retail uses, 67,000 gsf of office uses, 95,700 gsf of vacant entertainment space, and 11,800 gsf of mechanical, storage, and service space. The 935-939 Market building is 94 feet tall and has five stories; the 941-945 Market building is 30 feet tall and has two stories; and the 947-965 Market building is 45 feet tall and has two stories.

The project site is located in the Mid-Market section of downtown San Francisco, which is an area generally between Fifth and Eleventh Streets along the Market and Mission Streets corridor. Union Square is about four blocks to the northeast (north of Geary Street); the cable car turnaround at Market and Powell Streets is about one block to the northeast; and the Hallidie Plaza BART/Muni station entrance is one-half block to the northeast. The Yerba Buena Center Redevelopment Area is two blocks to the east and southeast. The Tenderloin neighborhood starts about one-half block to the northwest; and the Civic Center area is three to four blocks to the northwest.

The project block is bounded by Fifth Street, Market Street, Sixth Street, and Stevenson Street. This block is occupied by a large five-story retail building, the historic Hale Brothers Department Store at 901 Market Street,⁹ located at the intersection of Market and Fifth Streets; several two- to

⁹ Currently, the 901 Market Street building is partially occupied by Marshalls department store.

six-story commercial buildings located mid-block;¹⁰ and a 16-story office building with ground-floor retail at One Sixth Street, located at the intersection of Market and Sixth Streets. The project site is in the middle of this block. Immediately east of the project site is a two-story retail building currently occupied by Sheikh Shoes, and immediately west of the project site is a two-story retail building currently occupied by Pearl Art and Craft Supplies.

Neighboring blocks immediately north of the project block across Market Street are occupied by several two- to nine-story commercial buildings (combination of office and retail), interspersed with theaters, entertainment uses (adult entertainment and clubs), and parking.¹¹ Specifically, the block bounded by Mason, Eddy, Fifth, and Market Streets, located across Market Street and northeast of the project site, is occupied by the historic eight-story Mechanics Savings Bank building at 944-948 Market Street, a seven-story office above ground-floor retail building at 938-942 Market Street,¹² a one-story retail building, an eight-story office building at One Hallidie Plaza, the four-story Bristol Hotel, and a three-story office building. The triangular block bounded by Turk, Taylor, and Market Streets, located across Market Street and northwest of the project site, is occupied by a four-story office building with ground-floor grocery store (Jarman Market), seven two-story buildings occupied by retail use and offices,¹³ the Fox Warfield Theater at 982 Market Street, a seven-story office building with ground-floor retail, and a surface parking lot located at the intersection of Taylor and Turk Streets behind Market Street.

A large portion of the block immediately east of the project block and across Fifth Street is occupied by the eight-story Westfield-San Francisco Centre shopping mall at 865 Market Street. The remaining portion of this block is occupied by some mid-rise commercial buildings and hotels, including a ten-story office above ground-floor retail (Walgreens); an eight-story building with retail on the lower floors (Old Navy store) and hotel use above (Hotel Palomar); and an eight-story hotel (Hotel Milano). Across Mission Street to the south of this block is the Fifth & Mission/Yerba Buena Garage, which includes 2,585 parking spaces on eight floors and ground-floor retail uses.¹⁴

The block to the south of the project site is bounded by Fifth Street, Stevenson Street, Sixth Street, and Jessie Street. This block is occupied by several two- to five-story residential above

¹⁰ Several buildings along the south side of Market Street between Fifth and Sixth Streets were observed to be vacant (January 2007).

¹¹ In the South of Market area, streets that run in the northwest/southeast direction, such as Fifth and Sixth Streets, are generally considered north-south streets, whereas streets that run in the northeast/southwest direction, such as Market and Stevenson Streets, are generally considered east-west streets.

¹² An addition and change of use (from office above ground-floor retail to residential above ground-floor retail use) was approved in 2004 for the existing seven-story building at 938-942 Market Street; this building is located at the northeastern corner of Market and Mason Streets.

¹³ Several buildings along the north side of Market Street between Fifth and Sixth Streets were observed to be vacant (January 2007).

¹⁴ <http://www.fifthandmission.com/about.htm>, accessed January 10, 2007.

ground-floor retail buildings along Sixth Street;¹⁵ the Nordstrom surface parking lot; a City-owned NRG Thermal steam plant that supplies steam to buildings in the area; nine two- to ten-story newly-renovated live/work loft buildings with some ground-floor retail (410-424 Jessie Street); and a five-story office building (54 Mint Street) at the intersection of Jessie and Mint Streets. The two-story historic U.S. Mint building, with a small plaza along Fifth Street, is located immediately south of Jessie Street between Fifth and Mint Streets. The U.S. Mint building is planned for redevelopment with cultural and commercial uses.¹⁶ The block farther south, generally between Jessie and Mission Streets west of Mint Street, is occupied by low- and mid-rise office buildings with retail uses on the ground floor.¹⁷ The block to the west of the project block across Sixth Street is occupied by several two- to seven-story buildings with a mix of uses (commercial, residential, and hotels).¹⁸

Vehicles can access the site vicinity via Market Street, Sixth Street, or Fifth Street (all two-way roads), or alternately Stevenson Street (a one-way alley with traffic flow west to east). The project site is served by San Francisco Municipal Railway (Muni) bus and streetcar lines along Market Street, Muni bus lines along Fifth Street and Mission Street, and Muni Metro and Bay Area Rapid Transit (BART, through the Powell Street station at Fifth and Market).

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

San Francisco Planning Code and Zoning Map

The San Francisco *Planning Code* (Planning Code) implements the *San Francisco General Plan*, and governs permitted uses, densities, and configuration of buildings within San Francisco. The *Planning Code* incorporates by reference the City Zoning Maps. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project

¹⁵ Several buildings along Sixth Street between Stevenson and Jessie Streets were observed to be vacant (January 2007).

¹⁶ "City and County of San Francisco, Office of the Mayor, Mayor Newsom Signs Development Plans for Old Mint," press release, October 10, 2006, http://www.ci.sf.ca.us/site/mayor_page.asp?id=47312, accessed January 17, 2007.

¹⁷ UCSF, a former tenant of the 939 Market Street building on the project site, relocated to the 980-984 Mission Street building, which is south of the project site.

¹⁸ Several of the buildings in this block were observed to be vacant and boarded up (January 2007).

conforms to the *Planning Code* or an exception or variance is granted pursuant to provisions of the *Planning Code*.

The project site is located in the C-3-G and C-3-R Zoning Districts. The C-3-G District is composed of a variety of uses (including retail), many of which have a Citywide or regional function; the C-3-R District "is a regional center for comparison shopper retailing and direct consumer services." Both districts permit retail businesses "not limited to sales or services primarily for residents in the immediate vicinity" as a principal use.¹⁹ The retail uses proposed as part of the project would be consistent with the C-3G and C-3-R designations.

The C-3-G and C-3-R Districts permit a base FAR of 6:1. A maximum FAR of 9:1 is allowable with the use of TDRs and subject to applicable height and bulk limitations. The total gross floor area of the proposed project attributable to the FAR calculations is approximately 371,398 gsf, or 8.1 FAR, which is more than the base FAR floor area of 276,378 gsf and less than the allowable 9:1 gross floor area of 414,567 gsf. Therefore, pursuant to *Planning Code* Section 128 - Transfer of Development Rights in C-3 Districts, the proposed project would require the transfer of TDRs in accordance with the specific conditions of approval of its Section 309 authorization.

The site is in a 120-X Height and Bulk District, which would permit building heights of up to 120 feet and does not have bulk restrictions. The proposed building, with a height of approximately 90 feet plus a mechanical penthouse extending up to 106 feet, would, therefore, be in conformance with the 120-X Height and Bulk District.

Pursuant to *Planning Code* Section 151.1(a): Permitted Off-Street Parking in Downtown Residential (DTR) and C-3 Districts, off-street parking in C-3 Districts is not required for any use. The *Planning Code* does include requirements related to the maximum permitted accessory off-street parking for commercial uses. Section 204.5 of the *Planning Code* limits the amount of space that can be occupied by accessory parking (including driving aisles) for retail uses in C-3 Districts to seven percent of the proposed building's commercial gross floor area. Based on the proposed building's total commercial gross floor area (approximately 308,244 gsf),²⁰ the maximum space allowed for accessory parking is approximately 21,577 gsf. The proposed project includes approximately 81,180 gsf of parking space, located on basement floors B2 and B3. Therefore, the proposed project would require a Conditional Use authorization (CU) for the estimated additional 59,603 gsf of non-accessory parking space proposed.

The approximately 81,180 gsf of parking is currently proposed to be striped for approximately 210 independently accessible parking spaces. However, the *Planning Code* does not require that

¹⁹ San Francisco *Planning Code*, Section 210.3; Section 218.

²⁰ The building's total commercial gross floor area (308,244 gsf) includes the proposed retail space (262,181 gsf) and approximately 46,063 gsf added for purposes of the FAR calculation, to reflect an average floor height in excess of 15 feet.

off-street parking spaces in a C-3 District be independently accessible. (The requirement in Section 155(c) applies only to “required” spaces, and parking is not required in the C-3 District.) Therefore, the approximately 81,180 gsf of proposed parking space could be used to accommodate a greater number of parked cars (up to about 295) by use of valet parking on a seasonal basis. No exceptions to the *Planning Code* would be required.

Pursuant to *Planning Code* Section 155(i): General Standards as to Location and Arrangement of Off-Street Parking, Freight Loading and Service Vehicle Facilities, for every 25 off-street parking spaces provided, one such space shall be designed and designated for use by handicapped persons. Therefore, the proposed project (which would include 210 parking spaces or up to 295 valet spaces) would require eight to 12 spaces designed for handicapped use.

Based on *Planning Code* Section 152.1: Required Off-Street Freight Loading and Service Vehicle Spaces in C-3 and South of Market Districts, one loading space per 25,000 gsf of retail space would be required for the proposed project.²¹ Therefore, the proposed project (which would have approximately 262,180 gsf of gross retail space) would be required to provide approximately 10 loading spaces. The proposed project includes three full-size loading spaces and one smaller space for a van, and thus would need an exception to the loading requirement, under Section 309(a)(8): Permit Review in C-3 Districts.

Planning Code Section 155(s)(5)(A) restricts façade openings for access to off-street parking and loading in C-3 Districts. Access to off-street parking is limited to two façade openings of no more than 11 feet wide each or one opening of no more than 22 feet wide. Access to off-street loading is limited to one façade opening of no more than 15 feet wide. The proposed project would include one façade opening each for access to the underground parking and the loading area from Stevenson Street; the width of both openings would exceed the limit. Therefore, the proposed project would require a variance from the requirement of Section 155(s)(5)(A).

Planning Code Section 221.1 requires Conditional Use authorization of a change in use or demolition of a movie theater use. The proposed project would include demolition of the three existing buildings on the project site. The building at 947-965 Market Street once housed a movie theater. Therefore, the proposed project would require a Conditional Use authorization.

Other reviews and approvals that would occur with the proposed project include a shadow impact determination under Section 295 of the *Planning Code*; a determination of consistency with the City’s Priority Policies; a determination of consistency with the policies of the *San Francisco General Plan*; street tree protection; work within the public right-of-way; and demolition, grading and building permits.

²¹ For retail uses of more than 50,000 sq. ft. in a C-3 District, one loading space is required for every 25,000 sq. ft. of gross floor area. See *Planning Code* Table 152.1.

Plans and Policies

General Plan. In addition to the *Planning Code*, the *San Francisco General Plan (General Plan)* provides general policies and objectives to guide land use decisions. Any conflicts between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

The Commerce and Industry Element of the *General Plan* serves as a guide for the public and private sectors when making decisions related to economic growth and change in San Francisco. The three goals of the Element are continued economic vitality, social equity, and environmental quality. The Element includes a number of policies focused on the development of commercial activities. The Generalized Commercial and Industrial Land Use and Density maps in the Element refer to the *Downtown Plan*. The Element also references the *Downtown Plan* for specific policies regarding retail development.²²

Downtown Plan. The project site is located within the boundaries of the *Downtown Plan*, an Area Plan of the *General Plan*. Centered on Market Street, the *Downtown Plan* area is roughly bounded by Van Ness Avenue to the west, The Embarcadero to the east, Folsom Street to the south, and the northern edge of the Financial District to the north. The *Downtown Plan* is intended to manage growth, including maintaining a compact downtown core and directing growth to areas with developable space and easy transit accessibility. The plan also contains objectives and policies that address housing, open space, and historical preservation.

The project site is located in the area of the *Downtown Plan* known as the Downtown core. The project site is designated on the Downtown Land Use and Density Plan Map as General Commercial. Policy 3.1 of the *Downtown Plan* calls for “maintaining high quality, specialty retail facilities in the retail core,” which is generally bounded by Powell, Sutter, Kearny, and Market Streets. Policy 3.4 states that decision makers should “limit the amount of downtown retail space outside the ‘retail district’ to avoid detracting from its economic vitality.” The discussion under Policy 6.1 identifies locations, including Market Street west of Fifth Street, where supporting commercial and secondary office uses would be appropriate, acknowledging that in urban areas, a mix of uses often occurs.²³ The proposed retail building would be consistent with the General Commercial designation, but could be seen as extending the retail core.

²² *San Francisco General Plan*, Commerce and Industry Element, at http://www.sfgov.org/site/planning_index.asp?id=41413, accessed January 17, 2007.

²³ *San Francisco General Plan*, *Downtown Area Plan*, at http://www.sfgov.org/site/planning_index.asp?id=41405, accessed January 16 and November 2, 2007.

However, *Downtown Plan* Policy 3.2 encourages the provision of value-based retail in the project area.

Mid-Market Redevelopment Plan. The project site is located within the proposed Mid-Market Redevelopment Survey Area, which extends generally from Fifth to Tenth Streets along the Market and Mission Street corridors. On October 18, 2005, the San Francisco Redevelopment Agency (SFRA) recommended approval of the Redevelopment Plan for the Mid-Market Redevelopment Survey Area. Under a delegation agreement with the SFRA, the Planning Department, in implementing the Plan, concurrently proposed to administer land use regulations, specifically proposed zoning changes in the form of a proposed Mid-Market Special Use District (SUD). Under the proposed Mid-Market SUD, the project site zoning designation would not change. In 2005, the Planning Commission recommended that the Board of Supervisors (the Board) adopt both the proposed Mid-Market Redevelopment Plan and the proposed Mid-Market SUD, but no approval to date has occurred at the Board level, nor is it foreseeable that the Board would hear the proposed plan. Therefore, land use restrictions designed under the proposed Mid-Market SUD are not applicable to the proposed project and discussion of the Mid-Market SUD is merely intended to provide background into planning efforts undertaken for the project area.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City *Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1e, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, 5b, 5f, and 5g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1e, Land Use); (6) maximization of earthquake preparedness (Questions 13a through 13d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural and Paleontological Resources); and (8) protection of open space (Questions 8a and 8b, Wind and Shadow, and Questions 9a and 9c, Recreation).

Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects section below. The Evaluation of Environmental Effects discussion

provides information for use in the case report for the proposed project. The case report and approval motions for the proposed project will contain the Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies.

Other Approvals and Permits

Required approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection include the merger of the existing lots, grading permit, work within the public right-of-way and street tree construction protection by the San Francisco Department of Public Works (DPW). No approvals from regional, State, or Federal agencies are required.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor. Based on discussions of several of the checked environmental factors, the proposed project could result in significant environmental impacts, and an Environmental Impact Report will be prepared.

- | | | |
|--|--|---|
| <input type="checkbox"/> Land Use | <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Wind and Shadow | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Hazards/Hazardous Materials |
| <input checked="" type="checkbox"/> Cultural/Paleontological Resources | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources |
| <input checked="" type="checkbox"/> Transportation and Circulation | <input type="checkbox"/> Public Services | <input type="checkbox"/> Agricultural Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Mandatory Findings of Signif. |

1. Effects Found to be Potentially Significant

This Initial Study evaluates the proposed CityPlace project to determine whether it would result in significant environmental impacts. The designation of topics as "Potentially Significant" in the Initial Study means that the EIR assessment will enable a determination of whether or not there would be a significant impact. The proposed project could have a significant effect on transportation, traffic noise, and traffic-related air quality because the proposed project would increase traffic, transit use, and parking demand in the area. The potential transportation, traffic noise, and traffic air quality impacts will be analyzed in the EIR. The EIR will provide discussion of other topics such as land use and aesthetics, which are determined in this Initial Study not to be significant, but will be included in the EIR for informational purposes.

2. Effects Found Not to be Significant

The following potential individual and cumulative environmental effects of the proposed project were determined either to be less than significant or to be reduced to a less-than-significant level through recommended mitigation measures included in this Initial Study:

- Land Use;
- Aesthetics;
- Population and Housing;
- Cultural and Paleontological Resources;
- Transportation and Circulation (air traffic patterns);
- Noise (groundborne vibration, construction noise, aircraft noise, interior noise levels);
- Air Quality (odors, greenhouse gas emissions);
- Wind and Shadow;
- Recreation;
- Utilities and Service Systems;
- Public Services;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality;
- Hazards/Hazardous Materials;
- Minerals/Energy Resources; and
- Agricultural Resources.

These items are discussed with mitigation measures, where appropriate, in Sections E and F, and require no further environmental analysis in the EIR. All mitigation measures identified, including those for construction air quality, cultural resources (archaeology), and hazards/hazardous materials, have been agreed to by the project sponsor and will be incorporated into the proposed project. For items designated "Not Applicable," the conclusions regarding potential significant environmental effects are based upon field observations, staff and consultant experience and expertise on similar projects, and/or standard reference materials available within the Planning Department, such as the California Natural Diversity Database and maps published by the California Department of Fish and Game. For each checklist item, the evaluation has considered both individual and cumulative impacts of the proposed project. As indicated above, the EIR will discuss land use and aesthetic effects for informational purposes although this Initial Study determined that such effects resulting from the proposed project would not be significant.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
1. LAND USE AND LAND USE PLANNING— Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 1a: As noted in Section B, Project Setting, p. 17, the project site is located on a developed block in a developed area of downtown San Francisco. In the greater project vicinity, Union Square is about four blocks to the northeast (north of Geary Street); Hallidie Plaza is one-half block to the northeast; the Yerba Buena Center Redevelopment Area is about two blocks to the east and southeast; the Tenderloin neighborhood starts about one-half block to the northwest; and the Civic Center is three to four blocks to the northwest.

The project site contains three buildings, located at 935-939, 941-945, and 947-965 Market Street. One of the buildings is vacant and the other two are partly occupied with office and retail uses. The remaining tenant of 935-939 Market Street, the Asian Law Caucus, has firm plans to relocate in early fall 2008. The project sponsor is in negotiations for relocation assistance with the remaining tenant of 941-945 Market Street. The proposed project would involve the demolition of the three existing buildings and the construction of a larger retail building with below-ground parking. The proposed development would be incorporated into the established street plan and would create no impediment to the passage of people or vehicles. The proposed project would be constructed entirely within the boundaries of the existing project site, and would not displace or directly alter off-site uses. For those reasons, the proposed project would not physically divide an established community.

Question 1b: The City's *General Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy. (See also discussion under Compatibility with Existing Zoning and Plans, pp. 22-24.) As part of its decision to approve, modify or disapprove the proposed project, the Planning Commission will consider other potential conflicts with the *General Plan* and will weigh *General Plan* policies and decide whether, on balance, the project is consistent with the *General Plan*. Project conformance

with the *Planning Code*, which implements the *General Plan*, is discussed under Compatibility with Existing Zoning and Plans, pp. 19-21.

The City's *Downtown Plan* would be the guiding policy document for the project. The *Downtown Plan* contains some policies that relate to physical environmental issues, such as historic preservation, urban form, sunlight and wind, transportation, and seismic safety. The proposed project would not obviously or substantially conflict with any such policy. The proposed project is also consistent with the land use policies of the *Downtown Plan* (see also discussion under Compatibility with Existing Zoning and Plans, pp. 22-23).

Environmental plans and policies are those, like the Bay Area Air Quality Plan, that directly address physical environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

The Priority Policies established by Proposition M, and the sections of this Environmental Evaluation addressing the associated environmental issues, are listed in the discussion of Compatibility with Existing Zoning and Plans, earlier in this Initial Study. The Priority Policies, which provide general policies and objectives to guide certain land use decisions, contain some policies that relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy. As part of its decision to approve, modify or disapprove the proposed project, the Planning Commission will consider other potential conflicts with the Priority Policies and will weigh the Priority Policies and decide whether, on balance, the proposed project is consistent with the Priority Policies.

Question 1c: Development of the proposed project would result in an increase in site employment and an associated intensification of site use. The intensification of site use would be consistent with the character of the project area, which is highly urban with a variety of uses. The project site is located mid-block along Market Street between Fifth and Sixth Streets. The remaining portion of the project block and neighboring blocks are occupied by several low-, mid-, and high-rise commercial buildings (combinations of office and retail uses), interspersed with theaters, other entertainment uses (adult entertainment and clubs), and parking. The proposed project would develop new retail uses and associated parking in a moderately scaled five-story building on the project site that would be compatible with existing retail uses nearby and the overall commercial character of the project vicinity. The project site faces Market Street, an important transportation corridor in the City with transit medians, historic trolleys, bicycle lanes, subsurface Muni light rail and Bay Area Rapid Transit (BART) regional rail service, and other transit facilities. Development of the proposed project would not adversely affect the character of this existing transportation corridor.

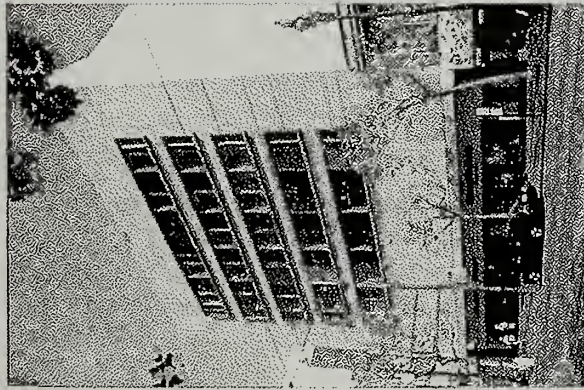
Based on the discussion above, the proposed project would not result in any significant land use impacts. However, land use will be discussed in the EIR for informational purposes.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 2a: The project site is in a highly urbanized area. It is located mid-block along Market Street between Fifth and Sixth Streets. The remaining portion of the project block and neighboring blocks on all sides of the site are occupied by a variety of low-, mid-, and high-rise commercial buildings (combination of office, retail, and theater buildings), interspersed with surface parking lots. Along Market Street in the vicinity of the project site, short-range views include adjacent, mid-scale development with continuous street building walls; 25- to 31-foot-wide brick sidewalks with street trees; and modern residential towers west of the project site. Market Street itself is a busy transportation corridor in the City with transit medians, several vehicle and bicycle lanes, and the operation of historic trolleys and other transit facilities. Mid- and long-range views to the east include the high-rise, high-density office towers (with ground-floor retail uses) of the Financial District and the historic Ferry Building at the terminus of Market Street. Market Street offers distant views of Twin Peaks to the west. The Market Street corridor is also visible in long-range, panoramic views from Twin Peaks.²⁴

The project site is fully developed and within the densely developed Market Street corridor. The 935-939 Market Street building is a 94-foot-tall, five-story structure; the 941-945 Market Street building is a 30-foot-tall, two-story structure; and the 947-965 Market Street building is a 45-foot-tall, two-story structure. (See Figure 12: Existing Buildings on the Project Site.) The

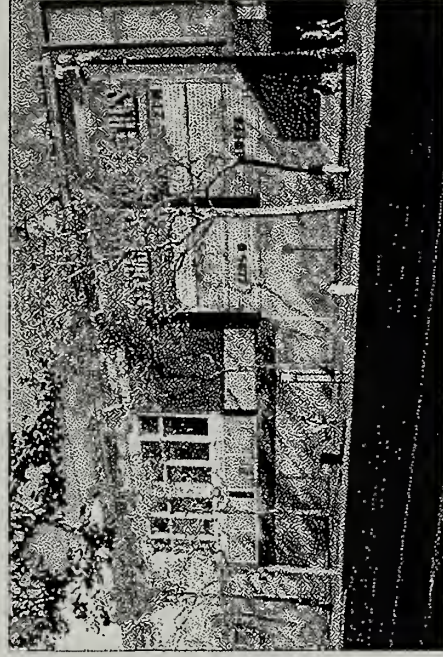
²⁴ Mid-Market Redevelopment Plan EIR, p. 68.



935-939 MARKET STREET



941-945 MARKET STREET



947-965 MARKET STREET

SOURCE: Gensler, Turnstone Consulting

CITYPLACE

2005.1074E

FIGURE 12: EXISTING BUILDINGS ON THE PROJECT SITE

proposed building would be five stories tall plus a mezzanine, rising to a total height of about 90 feet above street level; in addition, the building would have an enclosed 16-foot-tall mechanical penthouse above the roof. The proposed building would therefore be substantially taller than two of the existing buildings – the 30- to 45-foot-tall, two-story buildings – on the project site. The proposed building height would be similar to the existing, five-story building on the project site at 935-939 Market Street. The proposed building would also be substantially taller than the two-story retail buildings immediately adjacent to the project site on its east and west sides. However, the proposed building height would be similar to or less than the heights of other buildings in the surrounding project area, including seven- to eight-story buildings across Market Street to the northeast; the eight-story Westfield-San Francisco Centre shopping mall at the southeastern corner of Market and Fifth Streets; the five-story retail building (partially occupied by Marshalls department store) at the southwestern corner of Market and Fifth Streets; and the 16-story building (One Sixth Street) at the southeastern corner of Market and Sixth Streets.

The scenic views along Market Street in the project area are aligned with the street corridor and framed by existing development. Therefore, demolition of the existing on-site two- to five-story buildings and development of the similarly scaled (five-story) proposed project on the site would not alter or obstruct these existing views along Market Street.

Hallidie Plaza, located one-half block northeast of the project site, is an important transportation hub and public plaza that provides access to the subsurface Powell Street Muni/BART Station. The plaza also includes a tourist information center and the turnaround for the historic cable cars located at street level at the intersection of Market and Powell Streets. Hallidie Plaza was designed as a triple-story, partly below-grade landscaped plaza. It has brick paving on three levels, and its lower two levels are framed by granite walls. The scenic views from Hallidie Plaza are aligned with the Market Street corridor and framed by existing dense urban development. Given its triple-story sunken design, Hallidie Plaza offers few vantage points for unobstructed views along the Market Street corridor. Views from the cable car turnaround to the project site encompass the range of buildings in the surrounding area between the Westfield-San Francisco Centre and Sixth Street. The existing buildings are not notable from this vantage point; the proposed new building would be modern in design and therefore different from many, but not all, nearby structures. Demolition of the existing two- to five-story buildings and development of the similarly scaled (five-story) proposed project on the site would not adversely affect existing scenic views from Hallidie Plaza or the cable car turnaround.

Overall, the proposed project would not result in significant visual impacts to existing scenic vistas. The EIR will discuss effects of the proposed project on scenic vistas for informational purposes.

Question 2b: Street trees line the northern boundary of the project site; none of these trees would be removed as part of the proposed project. There are no other natural scenic resources on the project site or in the vicinity. Some of the buildings near the project site, including the historic Hale Brothers Department Store Building at 901 Market directly to the east, the Garfield Building and Mechanics Savings Building across Market Street to the northeast, the Warfield Theater across Market Street to the northwest, and the Wilson Building and Hale Brothers Building directly to the west, are considered historic resources. These buildings are prominent features of the project area and, due to their historic and architectural merit, may also be considered scenic resources. The proposed project would not remove or alter these buildings. In addition, the proposed project would be developed in an area of varied visual character, and the five-story height of the proposed building would be within the range of heights in the project vicinity. The proposed new building would not obscure existing public views of nearby historic buildings, but would frame and direct views along Market Street. The contemporary, transparent design and materials of the proposed project would be differentiated from nearby older buildings, rather than attempt to mimic historic patterns. The mullion grid would divide the curtain wall plane into smaller-scaled pieces and contribute texture to the façade. The building design would not visually overwhelm the nearby historic resources. See Topic E.4, Cultural Resources, p. 41, for a discussion of the impacts of the proposed project on the individual structures and the Market Street Theater and Loft District. Considering all of the above, the proposed project would not result in significant visual impacts to scenic resources. Nevertheless, the EIR will discuss effects of the proposed project on surrounding historic buildings and existing scenic resources for informational purposes.

Question 2c: Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and public. A proposed project would have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change to the existing visual setting.

The project site is developed with three buildings, ranging in height from 30 feet to 94 feet, that were originally built between 1901 and 1909 (see Figure 12, p. 29). The tallest on-site building, at 935-939 Market Street, is the most prominent; the two other on-site buildings are relatively small within the streetscape. The front building façade of the 935-939 Market Street building, an office building with ground-floor retail originally built in 1909, was extensively altered in the 1950's: the formerly brick and concrete building with Renaissance detailing and gray stone trimmings was remodeled into the existing form of a predominantly concrete vertical, flat façade with horizontal bands of windows.²⁵ The front building façade of the 941-945 Market building,

²⁵ Memorandum from Dan DiBartolo, Preservation Planner, to Debra Dwyer, Environmental Planner, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, November 1, 2007. A copy of this document is available for review by appointment at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, as part of Case File 2005.1074E.

an office building with ground-floor retail originally constructed in 1909, was completely altered in the 1930's: the original building with a two-part vertical composition and Renaissance ornamentation was remodeled with an Art Deco theme that left only the ornate cornice moulding from the original 1909 design. The front building façade and storefronts of this building have undergone further alterations. The 947-965 Market Street building, originally constructed in 1901, was similarly designed with ornamentation and included a Vaudeville theater. Over time it has been extensively altered to remove or cover key ornamentation with modern signage.

Structures along Market Street in the project area range from one to 16 stories high; the majority of structures have heights of two to eight stories, and many were built in the early 20th Century. The overall development pattern is of consistent building street walls fronting the sidewalk with full lot coverage and few setbacks between buildings. One of the visual features of the project vicinity is the presence of "flatiron" or "gore" buildings on triangular corner parcels on the north side of Market Street.²⁶ The nearest "flatiron" structure is the 960 Market Street building, located northwest of the project site across Market Street.

At approximately 90 feet, the proposed retail building height would be similar to the existing 94-foot-tall, five-story building on site at 935-939 Market Street, but would be 45 feet and 60 feet (up to three stories) taller than the other two existing buildings on site at 941-945 Market and 947-965 Market, respectively. The proposed building would also be about 60 feet (three stories) taller than the two existing 30-foot-tall, two-story buildings currently occupied by Sheikh Shoes and Pearl Art and Craft Supplies that are located immediately east and west of the project site respectively. The proposed building height and scale would be similar to or smaller than the five- to 16-story buildings in the project area, including the seven- to eight-story buildings across Market Street to the northeast; the eight-story Westfield-San Francisco Centre shopping mall and the five-story retail building (partially occupied by Marshall's) to the east; and the 16-story building (One Sixth Street) to the west of the project site. The proposed building would be one to four stories taller than other buildings across Market Street to the north, including the one-story retail building at One Hallidie Plaza, the four-story Bristol Hotel building, and the three-story office building, all located on the block bounded by Mason, Eddy, Fifth, and Market Streets; as well as the four-story office building with the ground-floor grocery store (Jarman Market), the seven two-story commercial buildings, and the Fox Warfield Theater, all located on the triangular block bounded by Turk, Taylor, and Market Streets.

The introduction of a new, larger building to the project site would be visible from adjacent development, public streets and sidewalks. However, the proposed five-story, 90-foot-tall building would be within the range of existing building heights and would be compatible with the scale and intensity of the overall development pattern in the project area. Considering all of the

²⁶ A flatiron or gore building is a triangular-shaped building.

above, the proposed project would not result in significant impacts to visual character. The EIR will discuss effects of the proposed project on visual character for informational purposes.

Question 2d: Current sources of light and glare on and from the project site include lighting within the existing buildings (for individual tenants and common areas) and lighting on the outside of the buildings. Existing nighttime lighting in the project site vicinity includes street lighting along Market, Mason, Turk, Stevenson, Fifth, and Sixth Streets, and lighting within and on the outsides of nearby buildings.

The proposed project would introduce additional sources of lighting to the project site. The proposed retail building would include lighting on the exterior and within common and tenant spaces inside the building. Lighting for the proposed subsurface parking garage would not be visible, except at the garage entrance on Stevenson Street. Although the existing sources of lighting would be removed from the project site, there would be a net increase in lighting on the site. However, given the highly urban nature of the proposed project, the new lighting would not add substantially to light levels in the project area. The proposed retail building would include transparent rather than reflective glass, in conformance with Planning Commission Resolution 9212. Given all of the above, the proposed project would not create new sources of light or generate obtrusive glare that would adversely affect daytime or nighttime views in the area, and the topic of light and glare will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 3a: The proposed project would not include residential development, and therefore, would not induce population growth directly through the construction of housing. The proposed project also would not indirectly increase population through changes to area roads, utilities, or other infrastructure.

The proposed project would result in an increase in business activity on the project site. The project site is currently developed with three mixed-use commercial and office buildings: 935-939 Market Street and 941-945 Market Street, which are partly vacant, and 947-965 Market Street, which is entirely vacant. The three buildings on the project site contain approximately 186,400 gsf, including approximately 11,900 gsf of retail uses, 67,000 gsf of office uses, 95,700 gsf of vacant entertainment space, and 11,800 gsf of mechanical, storage, and service space. The proposed project would involve demolition of these three buildings and construction of an approximately 376,620-gsf new building, with approximately 262,180 gsf of new retail uses; about 98,820 gsf of parking, loading, and driveways and maneuvering spaces; and about 15,620 gsf of building services and other uses.

Overall, employment on the project site is expected to increase, as the proposed project would include about 262,180 gsf of retail uses. Based on this proposed retail square footage, the proposed project would be estimated to employ up to 750 full-time persons.²⁷ However, the actual increase in employment compared to existing conditions would be lower, because the existing 935-939 Market Street and 941-945 Market Street buildings are partly occupied by existing general office and retail uses and employees.²⁸ As of April 2008, these existing uses employed approximately 27 people.²⁹

San Francisco's employment is projected to increase from about 553,090 employees in 2005 to about 593,370 in 2010, an increase of about seven percent.³⁰ Even if all of the employees associated with the proposed new retail use on the project site were conservatively assumed to be new to San Francisco, the increase of up to 750 employees as a result of the proposed project would represent about 1.86 percent of the City's estimated employment growth by the year 2010. This potential increase in employment would not be considered significant in the context of total employment in greater San Francisco.

The analysis of employment growth for the proposed Mid-Market Redevelopment Plan found that redevelopment of the Mid-Market Survey Area would result in an estimated net increase of 5,390 jobs. This increase was similarly considered small in the context of the jobs to be added to San Francisco as a whole, and potential growth inducement impacts were found to be less than

²⁷ Retail employment density estimated at 350 sq. ft. per employee, based on San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, p. C-3.

²⁸ The 947-965 Market Street building on the project site, formerly a theater, is currently entirely vacant. The remaining tenant of the 935-939 Market Street building has firm plans to relocate to other facilities. The project sponsor is in discussions with the remaining tenant of the 941-945 Market Street building on the project site regarding its future space and relocation requirements.

²⁹ Thompson, Sean, Urban Realty Co., Inc., written communication to Turnstone Consulting, December 17, 2007; confirmed April 2008.

³⁰ Association of Bay Area Governments (ABAG), *Projections 2007*.

significant.³¹ Therefore, the proposed project would not induce substantial growth or concentration of employment that would cause a substantial adverse physical change to the environment, and this topic will not be discussed further in the EIR.

Question 3b: The proposed project would not displace any housing because there are no residences on the project site. The increase in employment on the project site could potentially result in an increase in the demand for housing, assuming conservatively that at least some of the new retail employees on the project site would be new to San Francisco. An estimated 338,920 households resided in San Francisco in 2005. By 2010, the number of households is expected to increase to about 348,330 or increase by about three percent.³² Based on assumptions about commute patterns and household size, the proposed project (with an estimated 750 employees) would generate a potential demand for about 295 new dwelling units in San Francisco.³³ These new households would represent about 3.1 percent of the City's estimated household growth by the year 2010. This potential increase in housing demand as a result of the proposed project would not be considered substantial in the context of total housing demand in San Francisco. In addition, the actual increase in housing demand due to the project would likely be lower, as at least some of the project employees would likely not be new to San Francisco. The projected growth within the proposed Mid-Market Redevelopment Project Area includes an increase of about 3,300 housing units in the Mid-Market area; at least 15 percent of these units would be affordable, as required by California Community Redevelopment Law.³⁴ The impacts of this additional housing were analyzed in the Mid-Market Redevelopment Plan EIR. Given all of the above, analysis of housing displacement and demand will not be discussed further in the EIR.

Although housing demand in and of itself is not a physical environmental effect, an imbalance between local employment and housing can lead to long commutes with associated traffic and air quality impacts. Traffic issues are discussed further under Topic 5: Transportation and Circulation on pp. 46-47, and air quality issues under Topic 7: Air Quality on pp. 51-64.

Question 3c: As indicated above, the existing buildings on the project site do not contain residential use, and therefore the proposed project would not directly displace housing units. As of December 2007, the office tenants of 935-939 Market Street included the Asian Law Caucus, a

³¹ Mid-Market Redevelopment Plan EIR, pp. 49-50. The project site is within the Redevelopment Project Area and one of the buildings on the project site, 947-965 Market, was included in the development opportunity sites in the Redevelopment Plan.

³² ABAG, *Projections 2007*.

³³ This method multiplies the estimated project-related employment (750 employees) by the proportion of jobs in San Francisco held by people who live in the City (55 percent). This result, the approximate number of project-related employees who would live in the City (413), is divided by the projected number of workers per household in San Francisco (1.4). The estimated housing demand would be about 295 residential units. Based on data from ABAG *Projections 2002* and the Metropolitan Transportation Commission.

³⁴ Mid-Market Redevelopment Plan EIR, p. 50.

non-profit use. The Asian Law Caucus will be relocating to 53 Columbus Avenue in early fall 2008. Two government uses recently moved from the building: UCSF Citywide Case Management and Community Focus (services to the homeless and at-risk individuals), and the Social Security Administration (SSA). The project sponsor acquired an office building at 980-984 Mission Street and retrofitted the building for UCSF Citywide Case Management and Community Focus. SSA moved into the new Federal Building (commonly referred to as the "GSA building") at the intersection of Seventh and Mission Streets.

The remaining tenant of 941-945 Market Street is a retail use. The sponsor is in discussions with the tenant regarding its future space and location requirements. Thus, with the exception of SSA, the sponsor has assisted or is in the process of assisting with the relocation plans of all the tenants through rent subsidies, architectural services, or other forms of assistance. As noted previously, 947-965 Market Street is currently completely vacant. Given the assistance mentioned above and the evidence that tenants are able to relocate, the displacement of the current on-site tenants as a result of development of the proposed project would not be considered a significant impact, and will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
4. CULTURAL AND PALEONTOLOGICAL RESOURCES— Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 4a: A Historic Resource Evaluation Response Memorandum has been prepared for the proposed project to evaluate the historic significance of existing buildings on the project site and evaluate project impacts on historic resources for purposes of CEQA.³⁵ It is the basis of this analysis.

³⁵ Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street.

Existing Surveys

The three buildings on the project site (935-939 Market Street, 941-945 Market Street, and 947-961 Market Street) are not individually listed in, or located within a historic district listed in, any local, State, or Federal register of historic resources. The three buildings have been evaluated in several surveys of historical resources as summarized in **Table 1: Summary of Ratings under Existing Surveys**.

Historic Significance of Resources

935-939 Market Street

935-939 Market Street was built in 1907. The building features a tripartite vertical composition with Renaissance detailing and a façade of pressed buff brick and grey stone trim. The building was once owned by Emma Ferris, daughter of Claus Spreckels, and housed the Pantages Theater, operated by Alexander Pantages, known as the Theater Magnate of the West. The building was extensively altered in the 1950's when the façade was obscured by white tile and the building was remodeled in the form of a vertical box with horizontal window bands and a flat façade.

The Mid-Market Redevelopment Plan EIR considered whether the Market Street Theater and Loft District or the San Francisco Apartment Hotel District should be expanded to include additional properties.³⁶ 935-939 Market was not found to merit inclusion within these districts or any others in the vicinity. Due to extensive alteration in the 1950's, and changes in the surrounding neighborhood, the building has lost its integrity (of design, material, workmanship, setting, feeling and association) such that it no longer conveys its architectural significance and its historic significance derived from its association with important events and persons. The building does not meet the criteria for eligibility for listing in the California Register of Historical Resources applicable to historic architectural resources (*i.e.*, Events, Persons, Architecture). Absent any new information that would change the determination of the Mid-Market Development Plan EIR, 935-939 Market Street is not considered a "Historical Resource" for the purposes of CEQA.

³⁶ San Francisco Planning Department, *Mid-Market Redevelopment Plan Final EIR*, Case No. 2002.0805E, certified September 18, 2003, Table 10, p. 98. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2002.0805E.

Table 1: Summary of Ratings under Existing Surveys

Survey	935-939 Market Street	941-945 Market Street	947-965 Market Street
San Francisco Heritage Downtown Survey	Rated as "D" ("Minor or No Importance -- Buildings that are insignificant examples of architecture by virtue of original design or more frequently, insensitive remodeling")	Rated as "C" ("Contextual Importance -- Buildings that are distinguished by scale, materials, compositional treatment, cornice, and other features")	Rated as "B" ("Major Importance -- Buildings that are of individual importance by virtue of architectural, historical and environmental criteria")
UMB Survey	Listed as a "Priority 3" building (meaning lowest priority for preservation)	Listed as a "Priority 1" building (meaning highest priority for preservation)	Listed as a "Priority 1" building (meaning highest priority for preservation)
Planning Code Article 11	"Category V" (Unrated Building)	"Category V" (Unrated Building)	"Category V" (Unrated Building)
Mid-Market Redevelopment Plan EIR ^a	Determined not to be a historic resource under CEQA	Determined not to be a historic resource under CEQA	Determined not to be a historic resource under CEQA
1976 Citywide Architectural Survey	NA	Rated as "3" (on a scale of "2" to "5," with "5" being most significant)	Rated as "0" (on a scale of "2" to "5," with "5" being most significant)
949 Market Street EIR ^b	NA	NA	Determined not to be a historic resource under CEQA ^c
Report prepared by the Office of the Legislative Analyst ^d	NA	NA	Identified as a potential contributor to a potential non-contiguous multiple property historic district ^e
California Historical Resource Inventory System	NA	NA	Listed with a Status Code of "3S" (meaning that the building appears eligible for listing as an individual property through survey evaluation) ^f

Notes:

- a. San Francisco Planning Department, Mid-Market Redevelopment Plan Final EIR, Case No. 2002.0805E, certified September 18, 2003.
- b. San Francisco Planning Department, 949 Market Street Final EIR, Case No. 2000.965E, certified March 7, 2002.
- c. Page & Turnbull, Inc. St Francis Theater 949 Market Street Historic Resource Study. September 5, 2001. This document is available for public review by appointment at 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Case File 2000.965E.
- d. Office of the Legislative Analyst, Context Statement: San Francisco Neighborhood Movie Theater Non-Contiguous Multiple Property Historic District, April 27, 2006. This document is available for public review by appointment at 1650 Mission Street, Suite 400, San Francisco, CA 94103.
- e. The identification of 949 Market Street as a potential contributor to the San Francisco Neighborhood Movie Theater Non-contiguous Multiple Property Historic District was based upon the building's former use as a movie theater and not on any evaluation of the building itself or its significance (D. DiBartolo, Revised HIRER for 935, 943, and 949-961 Market Street, November 1, 2007).
- f. However, subsequent examination and analysis by a qualified expert (Page & Turnbull, Inc., 2001) resulted in a determination in 2001 that the building at 949 Market Street does not retain historic architectural integrity and that the building is not an historical resource for the purpose of CEQA.

Source: San Francisco Planning Department

941-945 Market Street

941-945 Market Street was built in 1909. Designed by the architectural firm Paff & Baur, the building features a two-part vertical composition with Renaissance detailing. The building was completely remodeled in the 1930s with an Art Deco theme, leaving only the ornate cornice. The façade and storefronts have also undergone subsequent alterations.

The Mid-Market Redevelopment Plan EIR considered whether the Market Street Theater and Loft District or the San Francisco Apartment Hotel District should be expanded to include additional properties.³⁷ 941-945 Market Street was not found to merit inclusion within these districts or any others in the vicinity. Due to extensive alteration in the 1930's, and changes in the surrounding neighborhood, the building has lost its integrity (of design, material, workmanship, setting, feeling and association). The building does not meet the criteria for eligibility for listing in the California Register of Historical Resources applicable to historic architectural resources (*i.e.*, Events, Persons, Architecture). Absent any new information that would change the determination of the Mid-Market Development Plan EIR, 941-945 Market Street is not considered a "Historical Resource" for the purposes of CEQA.

947-965 Market Street (a.k.a. 949 Market Street)

947-965 Market Street was built in 1901. Designed by prominent architect John Galen Howard, the building originally housed a 2,000-seat vaudeville theater (the Empress Theater), six retail stores, and a billiard parlor. In 1917, famed showman Sid Grauman acquired the Empress Theater and converted it to a motion picture theater (renamed The Strand). The exterior of the building has been extensively altered over time, including removal or concealment of large portions of the façade and the removal of a dome above the theater entrance. The interior of the building has also been extensively altered and reconfigured, resulting in the removal of all historic fabric.

The FEIR prepared for a previous project at 947-965 Market Street (*a.k.a.* 949 Market Street) determined that the building was not historically significant.³⁸ The Mid-Market Redevelopment Plan EIR considered whether the Market Street Theater and Loft District or the San Francisco Apartment Hotel District should be expanded to include additional properties. 947-965 Market Street was not found to merit inclusion within these districts or any others in the vicinity. In April 2006, the Office of the Legislative Analyst prepared a context statement for a potential

³⁷ Ibid.

³⁸ San Francisco Planning Department, *949 Market Street Final EIR*, Case No. 2000.965E, certified March 7, 2002, pp. 1-3, 28-38. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2000.965E.

San Francisco Neighborhood Movie Theater Historic District.³⁹ The former theater at 947-965 Market Street is tentatively listed as a contributor to the district. However, this study did not evaluate the significance or integrity of the property.

Although the building may once have met the criteria for inclusion in the California Register under Criterion C (Architecture), the building no longer retains integrity (of design, material, workmanship, setting, feeling and association) such that it no longer conveys its historic architectural significance. Absent any new information that would change the determination of the Mid-Market Development Plan EIR, 947-965 Market Street is not considered a "Historical Resource" for the purposes of CEQA.

Off-Site Historic Resources

While outside of any historic district, the project site is in the vicinity of several historic districts including:

- Civic Center Historic District (National Historic Landmark District, National Register Historic District, and locally designated under *Planning Code* Article 10);
- Potential San Francisco Apartment Hotel National Register Historic District;
- Kearny-Market-Mason-Sutter Conservation District (locally designated under *Planning Code* Article 11);
- Market Street Theater and Loft National Register Historic District;
- Potential Sixth Street Lodging House National Register Historic District;
- South of Market Extended Preservation District (locally designated under *Planning Code* Section 819); and
- Potential West SoMA Light Industrial and Residential District.

A number of individual buildings in the vicinity of the project site have been designated as historic resources including:

- Flood Building, 879-898 Market Street (locally designated under *Planning Code* Articles 10 and 11);
- Hale Brothers Department Store, 901 Market Street (Category I, National Register);
- Garfield Building, 938-942 Market Street (locally designated under *Planning Code* Articles 10 and 11);
- Meehan Savings Building, 948 Market Street (locally designated under *Planning Code* Article 11);

³⁹ Office of the Legislative Analyst, *Context Statement: San Francisco Neighborhood Movie Theater Non-Contiguous Multiple Property Historic District*, April 27, 2006. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review by appointment.

- Wilson Building, 973 Market Street (locally designated under *Planning Code* Article 11);
- Hale Brothers Building, 979 Market (locally designated under *Planning Code* Article 11);
- Warfield Theater, 982 Market Street (locally designated under *Planning Code* Article 11);
- U.S. Mint Building, 88 Fifth Street (locally designated under *Planning Code* Article 10, and listed on the National Register); and
- Haas Candy Factory, 54 Mint Street (locally designated under *Planning Code* Article 11, and listed on the National Register).

Impacts on Historical Resources

As discussed above, the project site does not contain any historic resources, as defined under CEQA. Nor is the project site within any existing or identified potential historic district. Therefore, demolition of the three existing buildings on the project site would not have a direct impact on an on-site historic resource or historic district.

New construction has the potential to affect the historic setting of nearby off-site historic resources. The neighborhood around the project site is the densely built-out commercial core of San Francisco, composed of buildings of varied height, massing and character. Building heights range from one-story commercial structures to a 16-story building at the southeast corner of Market and Sixth Streets. Most buildings range between three and seven stories in height. A variety of historic architectural styles are present, with many buildings designed in the Classical Revival and Beaux Arts styles popular after the 1906 earthquake.

The proposed project would not alter the physical characteristics of nearby individual and historic district resources that justify their inclusion in local, State, and/or Federal registers of historic resources. The proposed new infill construction would occur in an area of varied visual character outside of any historic district. The five-story height of the proposed project is within the varied range of heights currently found in the project vicinity. The proposed new building would not obscure existing public views of nearby historic buildings, but would frame and direct views along Market Street. The contemporary, transparent design and materials of the proposed project would be differentiated from nearby older buildings, rather than attempt to mimic historic patterns. It would not visually overwhelm nearby historic resources. The mullion grid would divide the curtain wall plane into smaller-scaled pieces and contribute texture to the façade. As such, the proposed project would not materially impact any adjacent off-site historic resources or their environment.⁴⁰

The topic of historic architectural resources will not be discussed further in the EIR.

⁴⁰ *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, p. 8.

Questions 4b and 4d: The project site has not previously been subject to a subsurface archaeological investigation. However, the site is located within an area of high archaeological sensitivity, with documented human occupation spanning from prehistoric to present times. Prehistoric archaeological deposits, particularly Early and Late period prehistoric sites, have been recorded in the project site vicinity. In addition, deposits associated with Gold Rush-era and late 19th-century structures and activities could be present beneath the ground surface in the project area.⁴¹

An Archaeological Research Design and Treatment Plan (ARDTP) has been prepared for the project by an independent consultant; the results of this study are summarized below.⁴² The ARDTP systematically examines the potential for the existence of subsurface cultural resources from the Prehistoric period (c. 4000 B.C. - 1776 A.D.), the Spanish, Mexican and Early American periods (1775 -1849), the California Gold Rush period (1849 - 1859), and later 19th century (1860 - 1906). The ARDTP also establishes a detailed approach to determining the significance of the archaeological property types expected to be potentially present and the procedures to be followed in pre-construction testing, data recovery, monitoring construction activities, treatment of artifacts and features, and recording and reporting data.

Prehistoric Era Resources. Prehistoric resources may be eligible for the California Register of Historical Resources (CRHR) under Criterion D, and thus significant under CEQA, due to their rarity, non-renewability, and data potential. Prehistoric archaeological resources may be CRHR-eligible because of their cultural importance to California's existing Native American people. A review of the available archival record indicates a high potential of encountering materials from the prehistoric period, particularly from the Early and Late period prehistoric times. Archival research did not identify any previously recorded prehistoric or contact period cultural resources within the CityPlace site. However, certain factors indicate that prehistoric deposits could be present within the project site.

The Colma Formation, a formation of sediments first deposited at the end of the Pleistocene, is present throughout the City, typically below layers of dune sand. Paleosols⁴³ above this level may be present within the project site. The 1852 U.S. Coast Survey map indicates that the project site was at the edge of a large flat area, as were nearby prehistoric sites, possibly indicating that the project area was a suitable place to settle in its natural state. The 1859 U.S. Coast Survey map indicates that a possible spring mound (or a low pond) was within the CityPlace project site and a pond was within the project block, indicating a high water table and convenient access to water

⁴¹ Mid-Market Redevelopment Plan EIR, pp. 93-96.

⁴² Archeo-Tec, *Archaeological Research Design and Treatment Plan for the 935-965 Market Street Project*, July 2007. This document is incorporated by reference into this Initial Study.

⁴³ Paleosol is buried, ancient soil within which cultural prehistoric deposits could be potentially found.

during the prehistoric and early historical period. It is therefore possible that the project site contains early buried prehistoric deposits.

Prehistoric site CA-SFR-113 was found one block away from the project site, beneath existing buildings with a one-story basement.⁴⁴ In addition to CA-SFR-113, several other sites have been found within one-half mile of the project site. CA-SFR-28, a deeply-buried early prehistoric site, was found about three blocks away from the project site. Overall, both shallow and very deeply buried prehistoric sites have been found near the project site.

Historic Era Resources. According to available archival evidence, the possibility of encountering cultural material from the Spanish, Mexican, or Early American periods is limited. According to the 1852 and 1853 Coast Survey Maps, the project site was empty of permanent structures during the Gold Rush era; however, several buildings, including dwellings and encampments, had been built in the surrounding blocks of downtown San Francisco during this time. It is possible that the project site might have been settled by squatters setting up temporary camps during the Gold Rush era. Although no permanent structures are pictured on early 1850s maps, permanent structures may have been present on the project site as early as 1853. The earliest map showing the first recorded structure on the project site is the 1859 U.S. Coast Survey map. No additional information about the occupants and use of this building could be determined. Refuse pits and wells related to this building may still exist beneath the project site. However, basement disturbance and cutting during the 1860s may have affected historic archaeological resources close to the ground surface at the project site. Overall, there is a limited possibility that mid-19th century archaeological deposits of significance exist within the confines of the project site.

The project site was densely developed by the end of the 1860s. Late 19th-century Sanborn maps show the project site densely developed with retail, manufacturing, and commercial buildings. Well-known establishments within the project site included the Hale Brothers Dry Goods Store at 937-947 Market Street and the Café Zinkand along Stevenson Street. By 1903, telephone directories indicate that the Hale Brothers Dry Goods store had been relocated on Market Street closer to the corner of Market and Sixth Streets. The most prominent business within the project site in 1906 was the Café Zinkand, a German café opened in the 1890s by Charles Zinkand, a German immigrant. The café was located at the eastern end of the project site along Stevenson

⁴⁴ The prehistoric site CA-SFR-113 was found at various locations between nine and 19 feet below ground surface. The width of CA-SFR-113 is greater than the distance between CA-SFR-113 and the project site, and since the site was characterized by multiple discontinuous loci, it is possible that it extends into the present project site.

Street and was well known as a fixture in San Francisco's bohemian dining scene. The café thrived until it was destroyed in the 1906 earthquake.⁴⁵

The project site was destroyed in the 1906 earthquake and fire, and was completely rebuilt by 1913. Post-earthquake, project site usage included stores, theaters, and Turkish baths. It is possible that archaeological remains from businesses that were in operation pre-earthquake, such as William Cline's grocery store and the Palm Dining Parlor along Market Street and the Café Zinkand, were encapsulated within the earthquake debris beneath the project site. Cultural materials buried within earthquake rubble have the potential to yield significant remains in the event that the deposit has sufficient integrity. However, basement disturbance and cutting during the 1900s may have already removed this debris.

Residential uses were present within the project site along Stevenson Street and above stores along Market Street during the 1880s, but were gone by 1900. Residential refuse deposits associated with these uses and a large boarding house on Market Street may be found beneath the project site. These deposits are expected to be located along the rear lot lines of houses pictured on Sanborn maps where privies or refuse pits may have been dug. However, it is unlikely that intact pit refuse features from the late 19th and early 20th centuries will be found beneath the project site due to the relatively early spread of municipal plumbing to the Market Street corridor.

At the project site, it is possible that disturbance and cutting related to modern basements may have affected resources close to the surface. In the event that historical archaeological resources remain beneath the project site, they are expected to exist within 15 to 20 feet of the ground surface. Based on archival research, the most historically significant potential late 19th-century commercial resource is the Café Zinkand. It is expected that archaeological deposits from the late 19th century within the CityPlace project area may answer research questions about infrastructure and waste disposal systems, and how they vary according to economic class.

The proposed project development would require excavation of most of the project site up to a depth of approximately 41 feet. The proposed excavation would be approximately 30 feet deeper than the existing on-site 11-foot-deep basement and foundations covering the entire project site. A small portion of the project site would be excavated down to 31.5 feet, taking into account the approximately 6,315 sq. ft. of unexcavated area along Stevenson Street at the third basement (B3) level (see Figure 11: Proposed Third Basement Floor (B3) Plan, p. 15). The impact of the existing 11-foot-deep basement on previously existing cultural resources is unknown.

⁴⁵ Clarence Edwards described Café Zinkand in his 1914 book of counterculture dining establishments entitled *Bohemian San Francisco* as "distinctly German in appointments and cooking and was the best of its kind in the city" (Edwards 1914). A postcard from Zinkand's depicts the exterior of the building, the interior of the banquet room, and the interior of the "ladies bar and grill" (Vintage Collectable Postcards 2006), revealing spacious rooms and ornate décor.

Since the proposed project involves disturbance of soils on site, it has the potential to affect significant prehistoric and historic archaeological resources buried beneath the existing buildings on site. Given the likelihood of encountering significant subsurface cultural resources within the project site, the ARDTP includes specific, feasible treatment measures that, when implemented, would mitigate potential project impacts on archeological resources to a less-than-significant level. Accordingly, in order to reduce potential impacts on significant archaeological resources, the project sponsor has agreed to comply with Mitigation Measure Cul-1 (Testing), pp. 97-101, and it is incorporated as part of the project. With implementation of this mitigation measure, the proposed project would not have any significant impacts on archaeological resources.

If human remains are encountered during project-related construction activities, drilling at that location shall stop and the San Francisco City and County Coroner shall be notified (as required by California Health and Safety Code Section 7050.5). In the event that the human remains are believed to be those of a Native American, the Most Likely Descendent will be identified, who will formulate an appropriate treatment plan in consultation with the project archeological consultant (as required by California Public Resources Code Section 5097.98). An appropriate treatment plan is expected to include removal of the remains with scientific recording and study, and timely return of the remains to the Most Likely Descendent for final reinterment. These requirements are incorporated into Mitigation Measure Cul-1, and would reduce potential impacts related to the discovery of human remains to a less-than significant level.

For the reasons noted above, the impact of the project on archaeological resources would be less than significant, and this topic will not be discussed further in the EIR.

Question 4c: The project site is completely developed with three buildings and is in a highly urban area. Therefore, the proposed project would not affect any unique geologic features. The project site is underlain by approximately 10 to 20 feet of fill, with Dune sand beneath the fill. The project would involve limited excavation into the underlying Colma Formation bedrock. For that reason, and given that few prior excavations in San Francisco have unearthed significant paleontological resources, it is unlikely that the project would disturb any unique paleontological resources. This topic requires no further discussion in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. TRANSPORTATION AND CIRCULATION— Would the project:					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Questions 5a–5b: The visitors to the project site and employees of the proposed retail uses would place increased demands on the local transportation system, including increased traffic, transit demand, and parking demand. The EIR will discuss the effects of the proposed project related to transportation and circulation, including potential impacts on intersection operations, transit demand, pedestrian circulation, parking, bicycles, and freight loading, as well as construction impacts.

Question 5c: The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, topic 5c is not applicable to the proposed project.

Question 5d: The proposed project would include the construction of an access point to the parking garage from Stevenson Street. The EIR will discuss the effects of the proposed project related to transportation and circulation, including potential hazards.

Question 5e: The project site is located in downtown San Francisco with existing emergency access to the site from both Market and Stevenson Streets. Impacts related to emergency access as a result of the proposed project will be discussed further in the EIR.

Question 5f: The EIR will address the effects of the proposed project on parking.

Question 5g: The EIR will address the effects of the proposed project on alternative transportation.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 6a through 6d, 6g: Existing surrounding, or ambient, noise levels in the project area are typical of noise levels in urban San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, and emergency vehicles. Traffic-related noise is particularly apparent along the Market Street transportation corridor, which is a major arterial for cars, trucks, buses and below-grade rail service. Other sources of noise in the project area include surrounding commercial, office and public land uses, such as the NRG thermal steam plant across Stevenson

Street to the south. Noise modeling and measurements of locations in the project area estimate noise levels at 66 to 75 dBA, Ldn, with the highest noise levels along Market Street.^{46,47}

The nearest sensitive noise receptors⁴⁸ are the residences located between Stevenson and Jessie Streets, directly across Stevenson Street and southeast of the project site. These residences include the recently converted live/work lofts at 410-424 Jessie Street.

Construction Noise

Construction and demolition activities proposed as part of the project would result in on- and off-site noise increases. Construction activities would include excavation and hauling, building erection, and finishing, and would result in noise that could be considered an annoyance by occupants of nearby properties. No pile driving would be necessary for the new building foundations, and the use of explosives for demolition is not proposed. Tunnels that contain rail lines for the BART and Muni subway systems underlie Market Street and are located about 25 feet northwest of the project site. Since the proposed project is located in proximity to BART and Muni subway tunnels, BART would require the project sponsor/contractor to monitor vibration related to construction of the proposed project. Overall, construction of the proposed project would not result in significant exposure to groundborne vibration, and vibration impacts would be less than significant. Vibration effects of the proposed project will not be discussed further in the EIR.

On-site and off-site noise level increases due to construction and demolition activities would be temporary and intermittent and would occur at different times throughout the phases of project construction, estimated to occur over 25 months. The magnitude of the construction noise would fluctuate depending on the type of construction activity, the sound level generated by the various pieces of construction equipment in operation, the duration of the noise, the distance between the noise source and listener, and the presence or absence of noise barriers. Impacts would generally be limited to the period of demolition, excavation and initial construction. The noise heard from interior construction typically is reduced substantially following the construction of exterior walls.

⁴⁶ *Mid-Market Redevelopment Plan Final EIR*, Case No. 2002.0805E, September 18, 2003, pp. 148-149; and *San Francisco General Plan*, Environmental Protection Element, Map 2, Thoroughfare Noise Levels, 1974.

⁴⁷ Noise is measured in decibels (dB). The A-weighted sound level or "noise level" is referenced in units of dB(A). It has been developed because the human ear does not respond uniformly to sounds at all frequencies. A doubling of sound energy results in a 3.0 dB(A) increase in noise levels. A 5.0 dB(A) increase is readily noticeable to the human ear and the human ear perceives a 10.0 dB(A) increase in sound level to be a doubling of sound. Average noise exposure over a 24-hour period is often measured as a day-night average sound level (Ldn).

⁴⁸ Given the potential effects of noise on people, some land uses are considered more sensitive to ambient noise levels than others. In general, residences, schools, hospitals, and nursing homes are considered to be more sensitive to noise.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the *San Francisco Police Code*). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dB(A) at a distance of 100 feet from the source. Impact tools (e.g., jackhammers, pile drivers, and impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if the noise would exceed the ambient noise level by 5 dB(A) at the project property line, unless a special permit is authorized by the Director of Public Works. The sensitive noise receptors near the project site, including the residential uses just southeast of the site, are already in an area with relatively high ambient noise levels (due primarily to vehicle traffic along and near Market Street); project-related construction noise would not add substantially to ambient noise levels. In addition, the proposed project would be required to comply with the Noise Ordinance, helping to minimize construction noise and limit the noise to certain hours. For those reasons, impacts related to construction noise would be less than significant. This topic will not be discussed further in the EIR.

Traffic-Related Noise

As indicated above, in urban San Francisco, vehicular traffic makes the greatest contribution to ambient noise levels. The proposed project would result in an increase in vehicle trips to and from the site, and could increase traffic noise levels in the project area. Based on published scientific acoustic studies, an approximate doubling of traffic volumes would be necessary to produce an increase in ambient noise levels noticeable to most people.

Project-generated traffic would enter and exit the proposed parking garage from Stevenson Street, and some drivers would likely park at the nearby Fifth & Mission Garage, adding vehicle trips to Stevenson, Market, Mission, Fourth, and Fifth Streets. Based on preliminary analysis of estimated daily traffic volumes on Fifth and Sixth Streets and Market Street near the project site, the proposed project is not expected to result in a doubling of traffic volumes on those roads.⁴⁹ The proposed project could generate up to 1,790 trips on Stevenson Street on each side of the garage driveway.⁵⁰ This increase in trips could lead to a noticeable noise increase along Stevenson Street, which typically carries relatively light traffic.⁵¹ Potential traffic noise effects of the proposed project will be analyzed further in the EIR.

⁴⁹ San Francisco Department of Parking and Traffic, Traffic Counts, 1/3/2007, at http://www.sfgov.org/site/dpt_index.asp (Traffic Engineering/Traffic Counts), accessed January 16, 2007.

⁵⁰ Rubendall, Geoffrey, DMJM Harris, written communication, January 4, 2008. The actual increase in traffic could be less than noted, as not all of the project-related vehicles would park in the proposed garage.

⁵¹ The typical weekday volume on Stevenson Street is about 500 vehicles. Tim Erney, DMJM Harris, personal communication, January 16, 2007.

Stationary Noise

The proposed project would include mechanical equipment, such as air conditioning units, that could produce operational noise. All such operations would be subject to the San Francisco Noise Ordinance, Article 29 of the *San Francisco Police Code*, which establishes noise limits for fixed noise sources such as building equipment. Compliance with Article 29, Section 2909, would minimize noise from building operations, and substantial increases in ambient noise levels due to building equipment noise would not be expected. Therefore, effects of the proposed project related to operational noise would not be significant and will not be discussed further in the EIR.

The proposed project would include three full-size loading spaces for trucks and one smaller space for a van, at the rear of the ground floor, that would be accessed directly from Stevenson Street. Some nearby noise-sensitive receptors (i.e., the residences along Stevenson Street) could perceive noise from the additional loading and unloading activities at the new building. Typical noises would be associated with truck doors closing, hand trucks or dollies rolling up curbs or loading ramps, and truck engines starting. Loading and unloading would be expected to occur generally during daytime business hours. In the context of the relatively high existing traffic noise levels in the vicinity during the day, noise from loading and unloading activities would not be considered a significant increase, and would not represent a significant impact. Therefore, this topic will not be evaluated in the EIR.

Interior Noise

The proposed project does not include any residential uses (which would be considered more sensitive than retail uses to existing ambient noise levels). The proposed retail building would provide adequate noise attenuation for the building's employees and visitors. Therefore, the proposed project would not expose persons within the building to significant noise levels, and this topic will not be discussed further in the EIR.

Questions 6e–6f: The project site is not located within two miles of any airport. Therefore, these issues would not be applicable to the proposed project.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
7. AIR QUALITY					
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project is located within the San Francisco Bay Area Air Basin, which encompasses San Francisco and surrounding counties and is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Since most of San Francisco's topography is below 200 feet, marine air typically flows easily across most of the City, making its climate cool and windy. Winds within the project area are generally from the west-southwest, west, and west-northwest.

Regulation of air quality and emissions is achieved through both Federal and State ambient air quality standards and limits for sources of air pollutants. Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (PM₁₀ & PM_{2.5}) and lead. The California Air Resources Board (CARB) has adopted more stringent ambient air quality standards (State standards) for most of the criteria pollutants. The San Francisco Air Basin has a history of air quality violations for ozone, CO, and particulate matter. The basin currently does not meet the State ambient air quality standards for ozone, PM₁₀, and PM_{2.5}. BAAQMD has adopted air quality management plans over the years to address control methods and strategies to meet air quality standards, the latest plans being the *Bay Area 2000 Clean Air Plan*, *2001 Ozone Attainment Plan*, and *2005 Bay Area Ozone Strategy*.⁵²

⁵² State and Federal air quality standards and the Bay Area's attainment status can be viewed on the BAAQMD website at <http://www.baaqmd.gov>.

Questions 7a-7e: The following discussion addresses potential air quality impacts of project construction and operation, and potential odors and toxic air emissions from the project. A discussion of potential climate change impacts is also included.

Construction-Related Impacts

During project construction, the operation of equipment and combustion of vehicle fuel would emit hydrocarbons, nitrogen oxides (NO_x), CO, SO₂, PM₁₀, and PM_{2.5}. Dust emissions during demolition and grading would increase particulate concentrations near the project site. A portion of these emissions would likely result from equipment traveling over unpaved areas, and such dust emissions would have the greatest nuisance potential. Fugitive dust is emitted during disturbance of soil and as a result of wind erosion over exposed earth. Dustfall can be expected at times on surfaces within 200 to 800 feet of the source.

Demolition, excavation, grading, foundation, and other ground-disturbing construction activity would affect localized air quality for up to about six months, causing a temporary increase in particulate dust and other pollutants. Sensitive receptors in proximity to the project site that could be affected by construction would include the residences in the live/work lofts located between Stevenson and Jessie Streets, immediately southeast of the project site.

The BAAQMD's approach to analysis of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions.⁵³ In order to reduce the quantity of dust generated during site preparation and construction, the project sponsor has agreed to implement **Mitigation Measure AQ-1** (identified on p. 97), incorporating the BAAQMD particulate control measures, such as spraying the project site with reclaimed water, covering stockpiles, and sweeping surrounding streets, that are applicable to all construction sites. The project sponsor also has agreed to implement measures (included in AQ-1) to reduce construction exhaust emissions of PM₁₀. With implementation of these measures, the potential construction-related air quality effects of the proposed project would be reduced to a less-than-significant level and this topic will not be discussed further in the EIR.

Operation-Related Impacts

The BAAQMD has established thresholds for projects requiring a quantified analysis of potential air quality impacts. These thresholds are based on the minimum size of projects that the BAAQMD considers capable of producing air quality problems due to vehicular emissions. The BAAQMD "generally does not recommend a detailed air quality analysis for projects generating less than 2,000 vehicle trips per day, unless warranted by the specific nature of the project or

⁵³ BAAQMD, *CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

project setting.”⁵⁴ The vehicle trips generated by the proposed project would exceed this screening threshold. Therefore, the operation-related impacts of the proposed project were estimated using the URBEMIS model approved by the BAAQMD. The model results show that the operational emissions of the proposed project would not exceed any of the significance thresholds for criteria pollutants.⁵⁵ Therefore, the operation-related air quality impacts of the project would be less than significant, and this topic will not be discussed further in the EIR.

Odors and Toxic Air Emissions

The proposed retail project would not result in a perceptible increase or change in odors on the project site or in the project vicinity. Odors from the project (such as those from vehicle operation or food preparation) would be typical of those in the project area. Odors from food service facilities would be controlled in accordance with BAAQMD Regulation 7 for odorous emissions and applicable requirements of the San Francisco Department of Public Health for proper kitchen filtration and food storage and disposal. Consequently, no significant impacts from odors are expected.

Toxic air pollutants would not be expected to occur in any large amounts in conjunction with the operation of the proposed project. The proposed project would require the operation of heating and cooling equipment that could emit trace quantities of toxic air contaminants; these emissions are common to commercial developments and would not be considered substantial.

In 1998, the CARB identified diesel particulate matter as a toxic air contaminant based on research indicating that long-term exposure to diesel particulate can increase the risk of a person developing cancer. Based on studies that show health risk from traffic-generated pollutants evident within 1,000 feet of major roadways (particularly for downwind receptors), and that exposure to traffic-generated pollutants is “greatly reduced at approximately 300 feet,” the CARB’s *Air Quality and Land Use Handbook* recommends that local agencies “avoid siting new sensitive land uses”⁵⁶ within 500 feet of a freeway [or] urban roads with more than 100,000 vehicles/day....”⁵⁷ The proposed project would not include sensitive uses as defined by the

⁵⁴ BAAQMD, *CEQA Guidelines*, December 1999.

⁵⁵ Criteria air pollutant emissions calculations prepared by Donald Ballanti, Consulting Meteorologist, June 16, 2008. This information is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File No. 2005.1074E.

⁵⁶ ARB, *Air Quality and Land Use Handbook*, April 2005. Available on the internet at: <http://www.arb.ca.gov/ch/handbook.pdf>. The Handbook (p. 2) describes “sensitive land uses” as including residences, schools, day care centers, playgrounds, and medical facilities, as these uses are locations where “sensitive individuals” [“those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality)”] are most likely to spend time.

⁵⁷ ARB, *Air Quality and Land Use Handbook*, April 2005, p. 4, Table 1-1.

CARB, nor is the site within 500 feet of a freeway or urban road that carries more than 100,000 vehicles per day.⁵⁸

Given the above information, project impacts with respect to odors and toxic air contaminants would not be significant and will therefore not be discussed further in the EIR.

Greenhouse Gases

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as a driving force for global climate change. Definitions of climate change vary between and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth's climate caused by natural fluctuations and anthropogenic activities which alter the composition of the global atmosphere.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction and operational phases. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. (Ozone—not directly emitted, but formed from other gases—in the troposphere, the lowest level of the earth's atmosphere, also contributes to the retention of heat.) While the presence of the primary GHGs in the atmosphere is naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide-equivalent" measures. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs, with much greater heat-absorption potential than carbon dioxide, include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming, although there is uncertainty concerning the magnitude and rate of the warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest

⁵⁸ California Department of Public Health, Environmental Health Investigations Branch, CEHTP Traffic Linkage Analysis, September 5, 2008. The results show the sum of all unadjusted traffic volumes within the buffer to be 71,174 vehicles. This information is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File No. 2005.1074E.

fires, and more drought years.⁵⁹ Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

The California Energy Commission (CEC) estimated that in 2004 California produced 500-million gross metric tons (about 550-million U.S. tons) of carbon dioxide-equivalent GHG emissions.⁶⁰ The CEC found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 23 percent and industrial sources at 13 percent.⁶¹ In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of the Bay Area's GHG emissions, accounting for just over half of the Bay Area's 85-million tons of GHG emissions in 2002. Industrial and commercial sources were the second largest contributors of GHG emissions with about one-fourth of total emissions. Domestic sources (e.g., home water heaters, furnaces, etc.) account for about 11 percent of the Bay Area's GHG emissions, followed by power plants at 7 percent. Oil refining currently accounts for approximately 6 percent of the total Bay Area GHG emissions.⁶²

Statewide Actions

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emission of greenhouse gases (GHG) would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.⁶³

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

⁵⁹ California Air Resources Board (ARB), 2006a. Climate Change website (<http://www.arb.ca.gov/cc/120106workshop/intropres12106.pdf>) accessed December 4, 2007.

⁶⁰ Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

⁶¹ California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 - Final Staff Report*, publication # CEC-600-2006-013-SF, December 22, 2006; and January 23, 2007 update to that report. Available on the internet at: <http://www.arb.ca.gov/cc/ccci/emsinv/emsinv.htm>.

⁶² BAAQMD, *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2002*, November 2006. Available on the internet at: http://www.baaqmd.gov/pln/ghg_emission_inventory.pdf.

⁶³ California Air Resources Board (CARB), *Climate Change Draft Scoping Plan: A Framework for Change*, June 2008 Discussion Draft. Available on the internet at: <http://www.climatechange.ca.gov/index.php>. Accessed July 29, 2008.

AB 32 establishes a timetable for the CARB to adopt emission limits, rules, and regulations designed to achieve the intent of the Act. CARB staff is preparing a scoping plan to meet the 2020 greenhouse gas reduction limits outlined in AB 32. In order to meet these goals, California must reduce its greenhouse gases by 30 percent below projected 2020 business-as-usual emissions levels, or about 10 percent from today's levels. In June 2008, CARB released its Draft Scoping Plan, which estimates a reduction of 169 million metric tons of CO₂-eq (MMTCO₂-eq). Approximately one-third of the emissions reductions strategies fall within the transportation sector and include the following: California Light-Duty Vehicle GHG standards, the Low Carbon Fuel Standard, Heavy-Duty Vehicle GHG emission reductions and energy efficiency, and medium and heavy-duty vehicle hybridization, high speed rail, and efficiency improvements in goods movement. These measures are expected to reduce GHG emissions by 60.2 MMTCO₂-eq. Emissions from the electricity sector are expected to reduce another 49.7 MMTCO₂-eq. Reductions from the electricity sector include building and appliance energy efficiency and conservation, increased combined heat and power, solar water heating (AB 1470), the renewable energy portfolio standard (33 percent renewable energy by 2020), and the existing million solar roofs program. Other reductions are expected from industrial sources, agriculture, forestry, recycling and waste, water, and emissions reductions from cap-and-trade programs. Local government actions and regional GHG targets are also expected to yield a reduction of 2 MMTCO₂-eq.⁶⁴ Measures that could become effective during implementation pertain to construction-related equipment and building and appliance energy efficiency. Some proposed measures will require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act (NEPA). Applicable measures that are ultimately adopted will become effective during implementation of the proposed project and the proposed project could be subject to these requirements, depending on the proposed project's timeline.

Local Actions

San Francisco has a history of environmental protection policies and programs aimed at improving the quality of life for San Francisco's residents and reducing impacts on the environment. The following plans, policies and legislation demonstrate San Francisco's continued commitment to environmental protection.

Transit First Policy. In 1973 San Francisco instituted the Transit First Policy, which added Section 16.102 to the City Charter with the goal of reducing the City's reliance on freeways and meeting transportation needs by emphasizing mass transportation. The Transit First Policy gives priority to public transit investments; adopts street capacity and parking policies to discourage

⁶⁴ Ibid.

increased automobile traffic; and encourages the use of transit, bicycling and walking rather than use of single-occupant vehicles.

San Francisco Sustainability Plan. In July 1997 the Board of Supervisors approved the Sustainability Plan for the City of San Francisco establishing sustainable development as a fundamental goal of municipal public policy.

The Electricity Resource Plan (Revised December 2002). San Francisco adopted the Electricity Resource Plan to help address growing environmental health concerns in San Francisco's southeast community, home of two power plants. The plan presents a framework for assuring a reliable, affordable, and renewable source of energy for the future of San Francisco.

The Climate Action Plan for San Francisco. In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution (Number 158-02) committing the City and County of San Francisco to a GHG emissions reduction goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the Public Utilities Commission published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions.⁶⁵ The Climate Action Plan provides the context of climate change in San Francisco and examines strategies to meet the 20 percent greenhouse gas reduction target. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions have been implemented or are now in progress.

San Francisco Municipal Transportation Agency's Zero Emissions 2020 Plan. The SFMTA's Zero Emissions 2020 plan focuses on the purchase of cleaner transit buses including hybrid diesel-electric buses. Under this plan hybrid buses will replace the oldest diesel buses, some dating back to 1988. The hybrid buses emit 95 percent less particle matter (PM, or soot) than the buses they replace, they produce 40 percent less oxides of nitrogen (NOx), and they reduce greenhouse gases by 30 percent.

LEED® Silver for Municipal Buildings. In 2004, the City amended Chapter 7 of the Environment Code, requiring all new municipal construction and major renovation projects to achieve LEED® Silver Certification from the US Green Building Council.

Zero Waste. In 2004, the City of San Francisco committed to a goal of diverting 75 percent of its' waste from landfills by 2010, with the ultimate goal of zero waste by 2020. San Francisco currently recovers 69 percent of discarded material.

Construction and Demolition Debris Recovery Ordinance. In 2006 the City of San Francisco adopted Ordinance No. 27-06, requiring all construction and demolition debris to be transported to a registered facility that can divert a minimum of 65 percent of the material from landfills. This ordinance applies to all construction, demolition and remodeling projects within the City.

Greenhouse Gas Reduction Ordinance. In May 2008, the City of San Francisco adopted an ordinance amending the San Francisco Environment Code to establish City greenhouse gas emission targets and departmental action plans, to authorize the Department of the Environment to coordinate efforts to meet these targets, and to make environmental findings. The ordinance establishes the following greenhouse gas emission reduction limits for San Francisco and the target dates to achieve them:

- Determine 1990 City greenhouse gas emissions by 2008, the baseline level with reference to which target reductions are set;
- Reduce greenhouse gas emissions by 25 percent below 1990 levels by 2017;
- Reduce greenhouse gas emissions by 40 percent below 1990 levels by 2025; and
- Reduce greenhouse gas emissions by 80 percent below 1990 levels by 2050.

The ordinance also specifies requirements for City departments to prepare departmental Climate Action Plans that assess, and report to the Department of the Environment, GHG emissions associated with their department's activities and activities regulated by them, and prepare recommendations to reduce emissions. As part of this, the San Francisco Planning Department is required to: (1) update and amend the City's applicable *General Plan* elements to include the emissions reduction limits set forth in this ordinance and policies to achieve those targets; (2) consider a project's impact on the City's GHG reduction limits specified in this ordinance as part of its review under CEQA; and (3) work with other City departments to enhance the "transit first" policy to encourage a shift to sustainable modes of transportation thereby reducing emissions and helping to achieve the targets set forth by this ordinance.

Go Solar SF. On July 1, 2008, the San Francisco Public Utilities Commission (SFPUC) launched their "GoSolarSF" program to San Francisco's businesses and residents, offering incentives in the form of a rebate program that could pay for approximately half the cost of installation of a solar power system, and more to those qualifying as low-income residents.

City of San Francisco's Green Building Ordinance. On August 4, 2008, Mayor Gavin Newsom signed into law San Francisco's Green Building Ordinance for newly constructed residential and commercial buildings and renovations to existing buildings. The ordinance specifically requires newly constructed commercial buildings over 5,000 square feet (sq. ft.), residential buildings over

⁶⁵ San Francisco Department of the Environment and San Francisco Public Utilities Commission, *Climate Action Plan for San Francisco*, Local Actions to Reduce Greenhouse Emissions, September 2004.

75 feet in height, and renovations on buildings over 25,000 sq. ft. to be subject to an unprecedented level of LEED® and green building certifications, which makes San Francisco the city with the most stringent green building requirements in the nation. Cumulative benefits of this ordinance include reducing CO₂ emissions by 60,000 tons, saving 220,000 megawatt hours of power, saving 100 million gallons of drinking water, reducing waste and storm water by 90 million gallons of water, reducing construction and demolition waste by 700 million pounds, increasing the valuations of recycled materials by \$200 million, reducing automobile trips by 540,000, and increasing green power generation by 37,000 megawatt hours.⁶⁶

The Green Building Ordinance also continues San Francisco's efforts to reduce the City's greenhouse gas emissions to 20 percent below 1990 levels by the year 2012, a goal outlined in the City's 2004 Climate Action Plan. In addition, by reducing San Francisco's emissions, this ordinance also furthers the State's efforts to reduce greenhouse gas emissions statewide as mandated by the California Global Warming Solutions Act of 2006.

The City has also passed ordinances to reduce waste from retail and commercial operations. Ordinance 295-06, the Food Waste Reduction Ordinance, prohibits the use of polystyrene foam disposable food service ware and requires biodegradable/compostable or recyclable food service ware by restaurants, retail food vendors, City Departments and City contractors. Ordinance 81-07, the Plastic Bag Reduction Ordinance, requires stores located within the City and County of San Francisco to use compostable plastic, recyclable paper and/or reusable checkout bags.

The San Francisco Planning Department and Department of Building Inspection have also developed a streamlining process for Solar Photovoltaic (PV) Permits and priority permitting mechanisms for projects pursuing LEED® Gold Certification.

The City's *Planning Code* reflects the latest smart growth policies and includes: electric vehicle refueling stations in city parking garages, bicycle storage facilities for commercial and office buildings, and zoning that is supportive of high density mixed-use infill development. The City's more recent area plans, such as Rincon Hill and the Market and Octavia Area Plan, provide transit-oriented development policies. At the same time there is also a community-wide focus on ensuring San Francisco's neighborhoods as "livable" neighborhoods, including the Better Streets Plan that would improve streetscape policies throughout the City, the Transit Effectiveness Plan, that aims to improve transit service, and the Bicycle Plan, all of which promote alternative transportation options. The City also provides incentives to City employees to use alternative commute modes and the City recently introduced legislation that would require almost all employers to have comparable programs.

⁶⁶ These findings are contained within the final Green Building Ordinance, signed by the Mayor August 4, 2008.

Each of the policies and ordinances discussed above includes measures that would decrease the amount of greenhouse gases emitted into the atmosphere and decrease San Francisco's overall contribution to climate change.

Impacts

Although neither the Bay Area Air Quality Management District (BAAQMD) or any other agency has adopted significance criteria for evaluating a project's contribution to climate change, the Office of Planning and Research (OPR) has asked the California Air Resources Board to "recommend a method for setting thresholds of significance to encourage consistency and uniformity in the CEQA analysis of GHG emissions" throughout the state because OPR has recognized that "the global nature of climate change warrants investigation of a statewide threshold for GHG emissions."⁶⁷ In the interim, on June 19, 2008 OPR released a Technical Advisory for addressing climate change through CEQA review. OPR's technical advisory offers informal guidance on the steps that lead agencies should take to address climate changes in their CEQA documents, in the absence of statewide thresholds. OPR will develop, and the California Resources Agency will certify and adopt amendments to the CEQA guidelines on or before January 1, 2010, pursuant to Senate Bill 97.

The informal guidelines in OPR's technical advisory provide the basis for determining the proposed project's contribution of greenhouse gas emissions and the project's contribution to global climate change. In the absence of adopted statewide thresholds, OPR recommends the following approach for analyzing greenhouse gas emissions:

- 1) Identify and quantify the project's greenhouse gas emissions;
- 2) Assess the significance of the impact on climate change; and
- 3) If the impact is found to be significant, identify alternatives and/ or mitigation measures that would reduce the impact to less than significant levels.

The following analysis is based on OPR's recommended approach for determining a project's contribution to and impact on climate change.

Identifying and quantifying a project's greenhouse gas emissions. OPR's technical advisory states that "the most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide." State law defines GHG to also include hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These latter GHG compounds are usually emitted in industrial processes, and therefore not applicable to the proposed project, however, the GHG

⁶⁷ Governor's Office of Planning and Research. *Technical Advisory- CEQA and Climate Change: Addressing Climate Change to the California Environmental Quality Act (CEQA) Review*. June 19, 2008. This document is available online at the Office of Planning and Research's website at: www.opr.gov. Accessed 07/24/2008.

calculation does include emissions from CO₂, N₂O, and CH₄, as recommended by OPR. The informal guidelines also advise that lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water usage and construction activities. The calculation presented below includes construction emissions in terms of CO₂⁶⁸, and annual CO₂-eq GHG emissions from increased vehicular traffic, energy consumption, as well as estimated GHG emissions from solid waste disposal. While San Francisco's population and businesses are expected to increase, overall projected water demand for San Francisco in 2030 is expected to decrease from current water demand due to improvements in plumbing code requirements and additional water conservation measures implemented by the San Francisco Public Utilities Commission (SFPUC).⁶⁹ Given the anticipated degree of water conservation, GHG emissions associated with the transport and treatment of water usage would similarly decrease through 2030, and therefore increased GHG emissions from water usage are not expected.

The proposed project would increase the activity on site by demolishing three existing two- to five-story buildings and redeveloping the site with one five-story, 90-foot-tall commercial building. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of traffic increases (mobile sources) and commercial operations associated with heating, energy use, water usage and wastewater treatment, and solid waste disposal (area sources). Construction of the proposed project would emit 423 tons CO₂-eq.⁷⁰ Direct project emissions of carbon dioxide equivalents (CO₂-eq) (including CO₂, NO_x, and CH₄ emissions) include 4,391 tons of CO₂-eq/year from transportation, and 797 tons of CO₂-eq /year from heating, for a total of 5,188 tons of CO₂-eq/year of project-emitted GHGs. The project would

⁶⁸ Construction emissions of carbon dioxide (CO₂) were calculated based on URBEMIS 2007 9.2.4 software. Attachment 2 of the Office of Planning and Research's *Technical Advisory- CEQA and Climate Change: Addressing Climate Change to the California Environmental Quality Act (CEQA) Review*, (June 19, 2008) lists and describes modeling tools used to calculate greenhouse gas emissions. URBEMIS is currently the only tool identified that has the capacity to calculate a project's CO₂ emissions from construction activities. It does not, however, calculate emissions from N₂O or CH₄, nor does any other modeling tool currently available. However emissions of these compounds would be a fraction of the total greenhouse gas emissions and therefore CO₂ is used as an indicator to estimate the construction-related emissions of the proposed project.

⁶⁹ The San Francisco Public Utilities Commission's (SFPUC) *City and County of San Francisco Retail Water Demands and Conservation Potential*, November 2004, documents the current and projected water demand given population and housing projections from Citywide Planning. This document is available at the SFPUC's website at: http://sfwater.org/detail.cfm/MC_ID/13/MSD_ID/165/C_ID/2281. Accessed 07/28/2008. The analysis provides projections of future (2030) water demand given anticipated water conservation measures from plumbing code changes, measures the SFPUC currently implements, and other measures the SFPUC anticipates on implementing. Conservation measures the SFPUC currently implements results in an overall reduction of 0.64 million gallons of water per day (mgd).

⁷⁰ Construction emissions and annual emissions are not intended to be additive as they occur at different points in the project's lifecycle. Construction emissions are one-time emissions that occur prior to building occupancy. Annual emissions are incurred only after construction of the proposed project and are expected to occur annually for the life of the project.

also indirectly result in GHG emissions from off-site electricity generation at power plants (approximately 2,283 tons of CO₂-eq/year) and from anaerobic decomposition of solid waste disposal at landfills, mostly in the form of methane (approximately 470 tons of CO₂-eq/year), for a GHG emissions total of approximately 7,941 tons of CO₂-eq/year. Construction emissions represent approximately 0.0005 percent of Bay Area GHGs emitted in 2002, and annual emissions represent approximately 0.009 percent of total Bay Area GHGs emitted in 2002.⁷¹

Assessing the significance of the impact on climate change. The project's incremental increases in GHG emissions associated with construction, traffic increases, commercial heating, electricity use, and solid waste disposal would contribute to regional and global increases in GHG emissions and associated climate change effects.

OPR encourages public agencies to adopt thresholds of significance, but notes that public agencies are not required to do so. Until a statewide threshold has been adopted, the Department analyzes a proposed project's contribution to climate change against the following significance criteria:

- 1) Does the project conflict with the state goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32 (California Global Warming Solutions Act of 2006), such that the project's GHG emissions would result in a substantial contribution to global climate change. **AND**
- 2) Does the proposed project conflict with San Francisco's Climate Action Plan such that it would impede implementation of the local greenhouse gas reduction goals established by San Francisco's Greenhouse Gas Reduction Ordinance.

The 2020 GHG emissions limit for California, as adopted by CARB in December of 2007, is approximately 427 MMTCO₂-eq. The proposed project's annual contribution would be approximately 0.002 percent of this total 2020 emissions limit, and therefore the proposed project would not generate sufficient emissions of GHGs to contribute considerably to the cumulative effects of GHG emissions such that it would impair the state's ability to implement AB32, nor would the proposed project conflict with San Francisco's local actions to reduce GHG emissions.

OPR's guidance states that, "Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project". And, "In determining whether a proposed project's emissions are cumulatively

⁷¹ The Bay Area Air Quality Management District reported regional Bay Area GHGs emissions in 2002 at approximately 85 million CO₂-eq tons. Bay Area 2002 GHG emissions are used as the baseline for determining whether a project's contributions are significant as these are the most recent emissions inventory for the Bay Area.

considerable, the lead agency must consider the impact of the project when viewed in connection with the effects of “past, current and probable future projects.”

As discussed previously, San Francisco has been actively pursuing cleaner energy, transportation and solid waste policies. In an independent review of San Francisco’s community wide emissions it was reported that San Francisco has achieved a 5 percent reduction in communitywide greenhouse gas emissions below the Kyoto Protocol 1990 baseline levels. The 1997 Kyoto Protocol sets a greenhouse gas reduction target of 7 percent below 1990 levels by 2012. The “community-wide inventory” includes greenhouse gas emissions generated by San Francisco by residents, businesses, and commuters, as well as municipal operations. The inventory also includes emissions from both transportation sources and from building energy sources.

Probable future greenhouse gas reductions will be realized by implementation of San Francisco’s recently approved Green Building Ordinance. Additionally, the recommendations outlined in the Draft AB 32 Scoping Plan will likely realize major reductions in vehicle emissions.

Further, the State of California Attorney General’s office has compiled a list of greenhouse gas reduction measures that could be applied to a diverse range of projects.⁷² The proposed project would meet the intent of many of the greenhouse gas reduction measures identified by the Attorney General’s office: (1) As infill development, the project would be constructed in an urban area with good transit access, reducing vehicle trips and vehicle miles traveled, and therefore the project’s transportation-related GHG emissions would tend to be less relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available than in the central city of San Francisco;⁷³ (2) As new construction, the proposed project would be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, helping to reduce future energy demand as well as reduce the project’s contribution to cumulative regional GHG emissions; (3) the proposed project would also be required to comply with the Construction Demolition and Debris Recovery Ordinance (Ordinance No. 27-06), requiring at least 65 percent of all construction and demolition material to be diverted from landfills; and (4) the proposed project would preserve existing street trees, regulating outdoor temperatures and aiding in carbon sequestration.⁷⁴

⁷² State of California, Department of Justice, “*The California Environmental Quality Act: Addressing Global Warming Impacts at the Local Agency Level*,” Updated 3/11/08. Available at: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf. Accessed 04/11/2008.

⁷³ The California Air Pollution Control Officer’s, *CEQA and Climate Change* (January 2008) white paper identifies infill development as yielding a “high” emissions reduction score (between 3-30 percent). This paper is available online at: <http://www.capcoa.org/ceqa/CAPCOA%20White%20Paper%20-%20CEQA%20and%20Climate%20Change.pdf>. Accessed April 15, 2008.

⁷⁴ Carbon sequestration is the capture and long-term storage of carbon dioxide before it is emitted into the atmosphere.

Given that: (1) the proposed project would not contribute significantly to global climate change such that it would impede the State's ability to meet its greenhouse gas reduction targets under AB 32, or impede San Francisco's ability to meet its greenhouse gas reduction targets under the Greenhouse Gas Reduction Ordinance; (2) San Francisco has implemented programs to reduce greenhouse gas emissions specific to new construction and renovations of residential and commercial developments; (3) San Francisco's sustainable policies have resulted in the measured success of reduced greenhouse gas emissions levels, and (4) current and probable future state and local greenhouse gas reduction measures will continue to reduce a project's contribution to climate change, the proposed project would not contribute significantly, either individually or cumulatively, to global climate change.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
8. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 8a: To provide a comfortable wind environment for people in San Francisco, the City has established wind criteria for the downtown area in Section 148 of the *Planning Code*. The criteria are based on pedestrian-level wind speeds that include the effects of turbulence. These adjusted wind speeds are referred to as "equivalent wind speeds." Section 148 of the *Planning Code* establishes "comfort criteria" equivalent wind speeds of 7 miles per hour (mph) in public seating areas and 11 mph in areas of substantial pedestrian use. New buildings and additions to buildings are not permitted to cause ground-level winds to exceed these levels more than 10 percent of the time. According to the *Planning Code*, new buildings and additions must be designed to reduce ambient wind speeds to meet these requirements, unless certain requirements for an allowable exception are met as described in Section 148. In addition to comfort criteria, *Planning Code* Section 148 establishes a wind hazard criterion of an hourly averaged wind speed of 26 mph, not to be exceeded more than once during the year. In C-3 Districts, no building or addition is permitted that causes wind speeds to exceed the hazard level of 26 mph for more than one hour of any year. No exception may be granted.

An independent consultant studied the potential pedestrian-level wind impacts of the proposed project.⁷⁵ The information and conclusions from that analysis are incorporated by reference and presented below.

Prevailing winds in San Francisco are generally from the west, off the Pacific Ocean. Wind speeds, in general, are greatest in the spring and summer, and least in fall. Daily variation in wind speed is evident, with the strongest wind in the late afternoon and lightest winds in the morning. Ground-level wind accelerations near buildings are controlled by exposure, massing, and orientation. Exposure is a measure of the extent that the building extends above surrounding structures into the wind stream. A building that is surrounded by taller structures is not likely to cause adverse wind accelerations at ground level, while even a small building can cause wind problems if it is freestanding and exposed.

Massing is important in determining wind impact because it controls how much wind is intercepted by the structure and whether building-generated wind accelerations occur above-ground or at ground level. In general, slab-shaped buildings have the greatest potential for wind problems. Buildings that have an unusual shape or utilize setbacks have a lesser effect. A general rule is that the more complex the building is geometrically, the lesser the probable wind impact at ground level.

Orientation also determines how much wind is intercepted by the structure, a factor that directly determines wind acceleration. In general, buildings that are oriented with their wide axis across the prevailing wind direction would have a greater impact on ground-level winds than a building oriented with its long axis along the prevailing wind direction.

The project site is located in the center of the block bounded by Market Street, Fifth Street, Stevenson Street, and Sixth Street, in downtown San Francisco. It is currently occupied by three buildings ranging from two to five stories or 30 to 94 feet in height. Other buildings in the project block range from two to 16 stories. Buildings of seven to 10 stories are located northwest of the project site across Market Street. Buildings directly west of the project site are mainly two stories in height, with larger structures of three to 10 stories located further west. The terrain in the immediate vicinity of the site is flat. The project site is somewhat sheltered from prevailing winds by existing structures, but would not be described as being in a substantial wind shadow created by larger structures.

The proposed project would demolish the existing on-site buildings and develop a 90-foot-tall, five-story retail building covering the entire project site. In addition, the proposed building would

⁷⁵ Donald Ballanti, Certified Consulting Meteorologist, *Wind Impact Evaluation for the Proposed 935-965 Market Street Project, San Francisco*, March 8, 2007. This letter report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File No. 2005.1074E.

have an enclosed 16-foot-tall mechanical penthouse. A five-level, approximately 830-sq.-ft enclosed atrium would be provided above a portion of the ground-floor lobby along Market Street. No other cut-outs, setbacks, or terraces would be provided in the proposed building.

The proposed project would have little potential to cause substantial wind accelerations. At 90 feet tall, the proposed five-story building would be of modest height when compared to nearby buildings and existing buildings on the project site. The modest height of the proposed building would also limit the amount of wind energy that would be intercepted by the building. Wind accelerations created by the proposed building would tend to occur above the rooftops of adjacent buildings. These wind accelerations would occur above street level and would not affect pedestrian comfort.⁷⁶

In summary, based on considerations of exposure, massing and orientation, the proposed project does not have the potential to cause significant changes to the wind environment in pedestrian areas adjacent or near the project site.

In view of the above analysis, significant wind impacts would not result from the proposed project, and the potential wind effects of the proposed project will not be discussed further in the EIR.

Question 8b: Section 295 of the *Planning Code* was adopted in response to Proposition K (passed in November 1984) in order to protect public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year-round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant. The nearest public open space under the jurisdiction of the Recreation and Park Department is the public plaza at Union Square, located about three to four blocks northeast of the project site. The proposed retail building would be 90 feet tall, and thus a shadow fan analysis for potential Section 295 shadow effects of the proposed project was required by the Planning Department. The results of the shadow fan analysis indicated that the proposed retail building would not cast new shadows on any Recreation and Park Department properties subject to *Planning Code* Section 295.⁷⁷ Therefore, the proposed project would not result in significant shadow impacts and that topic will not be addressed further in the EIR.

⁷⁶ Ballanti, *Wind Impact Evaluation for the Proposed 935-965 Market Street Project, San Francisco*.

⁷⁷ Michael Li, San Francisco Planning Department, Letter to Mary Murphy, December 21, 2006. This letter is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File No. 2005.1074E.

Section 295 does not provide protection from shadows for non-Department of Recreation and Park properties or private properties. The proposed building would be up to three stories taller than adjacent buildings and would add new shade to portions of the project site as well as to portions of surrounding properties, sidewalks and streets. However, the proposed building would not substantially increase the total amount of shading in the neighborhood above levels that are common and generally accepted in urban areas. While additional shading and loss of sunlight would be an adverse change for affected neighbors, it would not constitute a significant effect on the environment under CEQA. Given the urban nature of the project setting and the above discussion, the proposed project would not result in a significant shadow impact.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
9. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Questions 9a through 9c: The San Francisco Recreation and Park Department oversees and maintains more than 200 parks, playgrounds, and open spaces throughout the City. System recreation facilities also include 15 recreation centers, nine swimming pools, five golf courses, and more than 300 athletic fields, tennis courts, and basketball courts.⁷⁸ Public park and recreation facilities near the project site include the public plaza at Union Square, located about three blocks northeast of the project site; Boeddeker Park, Tenderloin Recreation Center, and Civic Center Plaza, located about three to five blocks northwest of the project site; Yerba Buena Gardens, located about three to four blocks southeast of the project site; and South of Market Recreation Center, located about three blocks south of the project site.⁷⁹ In addition, United Nations Plaza at 7th and Market Streets is a public open space east of Civic Center Plaza, owned and managed by the Department of Public Works (DPW).

⁷⁸ San Francisco Recreation and Park Department website, accessed January 11, 2007; San Francisco Recreation and Park Department, *Recreation Assessment Report*, August 2004, p. 21, available on-line at http://www.parks.sfgov.org/wcm_recpark/Notice/SFRP_Summary_Report.pdf, accessed January 11, 2007.

⁷⁹ San Francisco Recreation and Park Department, San Francisco Recreation and Parks Map, available on-line at <http://www.parks.sfgov.org>, accessed January 11, 2007.

The proposed project would not contribute significantly to the expected increase in the residential population of San Francisco.⁸⁰ Employees of the proposed retail uses might use recreational facilities in the project area, but the resulting demand for recreational facilities would not be considered substantial. The proposed project would not include recreational facilities and would not directly affect existing recreational resources. Impacts to recreational facilities would not be significant, and this topic will not be addressed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. UTILITIES AND SERVICE SYSTEMS—Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is within an urban area and is currently served by public utilities and service systems, including provision of water, power, wastewater collection and treatment, and solid waste collection and disposal. The proposed project would increase the amount of retail use and intensity of development on the project site, resulting in an increase in demand for and use of public utilities and service systems on the site.

⁸⁰ The proposed project would not directly increase the residential population; if the retail employees of the proposed project were new to San Francisco, they would contribute to an indirect population increase.

Questions 10a through 10e: The following discussion addresses potential impacts related to water and wastewater services and systems.

Water

The San Francisco Public Utilities Commission (SFPUC) provides water to approximately 2.4 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties.⁸¹ Approximately 96 percent of the water provided to San Francisco is supplied by the SFPUC Regional Water System, which is made up of water from the Hetch Hetchy Reservoir and Bay Area reservoirs in the Alameda Creek and Peninsula watersheds.⁸² Citywide water use in 2000 was approximately 84 million gallons per day (mgd), of which about 57 percent was for residential customers and about 34 percent for business. System-wide demand is projected to increase to about 300 mgd by 2030. Residential water demand in San Francisco is expected to decrease slightly between 2000 and 2030, in spite of a projected increase in the City's population, because of an anticipated decrease in household size and an increased use of water-efficient plumbing fixtures.⁸³

The City's 2005 Urban Water Management Plan (UWMP) projects that, during normal precipitation years, the SFPUC will have adequate supplies to meet projected demand. During multiple dry years, however, additional water sources will be required.⁸⁴ To address this issue, the SFPUC has embarked on a multi-year program, called the Water System Improvement Program (WSIP), to rebuild and upgrade the water system.⁸⁵ A revised WSIP was issued in January 2006 and is undergoing environmental review.^{86,87} The SFPUC also is developing an Integrated Water Resource Plan, a planning document detailing how long-term water demand can also be met through a mix of water supply options (such as groundwater, recycled water, conservation, and imported water).

⁸¹ SFPUC, *2005 Urban Water Management Plan for the City and County of San Francisco*, adopted December 13, 2005, p. 5.

⁸² SFPUC, *Urban Water Management Plan*, p. 9. Groundwater and recycled water make up the remainder of the SFPUC supplies to the City.

⁸³ SFPUC, *Urban Water Management Plan*, pp. 42-43.

⁸⁴ SFPUC, *Urban Water Management Plan*, p. 47.

⁸⁵ SFPUC, "Notice of Changes to Water System Improvement Program AB 1823 (March 8, 2006)," available at http://sfwater.org/detail.cfm/MC_ID/13/MSID/167/C_ID/3007, accessed January 11, 2007.

⁸⁶ SFPUC, "Water System Improvement Program (January 2006)," available at http://sfwater.org/detail.cfm/MC_ID/13/MSID/167/C_ID/3007, accessed January 11, 2007.

⁸⁷ San Francisco Planning Department, *SFPUC Water System Improvement Program Draft PEIR*, available at http://www.sfgov.org/site/planning_index.asp?id=37672, accessed August 13, 2007.

The proposed project would result in an increase in water use at the project site, but the increase would not be in excess of amounts expected and provided for in the project area. The proposed project would not require new or expanded water facilities, nor would it adversely affect the City's water supply. Given all of the above, the proposed project would not be expected to have a significant impact on water supply, either individually or cumulatively, and water supply will not be discussed further in the EIR.

Stormwater and Wastewater

San Francisco has a combined sewer system that collects sanitary sewage and stormwater in the same sewers and treats the combined wastewater in the same treatment plants. Stormwater and wastewater from the project site flow to and are treated at the Southeast Water Pollution Control Plant. During wet weather, the Southeast Plant is supplemented by other facilities and if wet-weather flows exceed the capacity of the overall system, the excess is discharged from combined sewer overflow (CSO) structures located along the waterfront. All CSO discharges are regulated with permits issued by the Regional Water Quality Control Board and with the U.S. EPA's Combined Sewer Overflow Control Policy.

In 2005, the SFPUC launched a citywide \$150 million Five-Year Wastewater Capital Improvement Program to improve the reliability and efficiency of the combined system. The program is aimed at reducing flood risk in many neighborhoods, and upgrading treatment plants, including the Southeast Plant. The SFPUC also is in the midst of a Sewer System Master Planning process to develop a long-term strategy for the management of the City's wastewater and stormwater. The Master Plan, which will undergo separate CEQA review, is expected to be completed in 2008. The proposed project would add new retail uses to the project site, increasing the demand for wastewater and stormwater services, but the increase would not be in excess of amounts expected and provided for in the project area.

Topic 14: Hydrology and Water Quality, pp. 79-84, addresses the potential for the proposed project to degrade water quality. The project sponsor will pay the requisite wastewater discharge fee assessed by the SFPUC; the fee would compensate the SFPUC for the impacts of the proposed project on the wastewater system.

In light of the above, impacts related to water and wastewater service and facilities would be less than significant, and will not be discussed in the EIR.

Questions 10f-10g: Following sorting of recyclable materials at the NorCal Transfer Station near Candlestick Park, San Francisco solid waste is transported to, and disposed of at, the Altamont Landfill in Alameda County. The operation of the landfill is required to meet Federal, State, and local solid waste regulations. The Altamont Landfill has a permitted maximum disposal of 6,000 tons per day and received about 1.34 million tons of waste in 2002 (the most

recent year reported by the State). According to the San Francisco Department of the Environment, the City generated 1.88 million tons of waste material in 2002: approximately 63 percent (1.18 million tons) was diverted through recycling, composting, reuse, and other efforts; and approximately 37 percent (700,000 tons) went into landfill.⁸⁸ San Francisco has a goal to divert 75 percent of its waste away from disposal by 2010 and to divert all waste by 2020.

The total permitted capacity of the Altamont landfill is more than 124 million cubic yards and with this capacity, the landfill can operate until approximately 2025.⁸⁹ In addition, prior to receipt of a demolition permit, the project is required to show compliance with the City's Construction and Demolition Debris Recovery Ordinance (Ordinance 27-06). Requirements for a full demolition include the development of a waste diversion plan that provides for a minimum of 65 percent diversion of construction and demolition debris, including materials source separated for reuse and recycling.

Given the above, the solid waste associated with the construction and operation of the proposed project would not substantially affect the projected life of the Altamont Landfill, and therefore would result in a less-than-significant impact. For these reasons, solid waste will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
11. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is within an urban area that is currently served by public services, including provision of fire suppression and emergency medical services, police protection, public schools, recreational facilities, and other public services. The proposed project would increase the intensity of development on the site and potentially the demand for and use of public services in the project vicinity. The following discussion addresses potential impacts on fire and police

⁸⁸ City and County of San Francisco, Office of the Controller, Community Indicators Report, http://www.sfgov.org/wcm_controller/community_indicators/physicalenvironment/recycling/recycling.htm accessed January 17, 2007.

protection. The proposed project would not directly increase the residential population of San Francisco, and therefore, would not increase the demand for school services. Impacts on recreation are discussed under Topic 9: Recreation on pp. 67-68.

Fire Protection

The San Francisco Fire Department (SFFD), headquartered at 698 Second Street, provides fire suppression and emergency medical services to the City and County of San Francisco, including the project site. The SFFD consists of three divisions, which are further divided into 10 battalions and 42 active stations located throughout the City. The closest fire station to the project site is Station 1, located at 676 Howard Street (near Third Street), about 0.7 mile from the project site. Other fire stations in the vicinity include Station 3 at 1067 Post Street (near Polk Street, about 0.9 mile away), and Station 8 at 36 Bluxome Street (near Fourth Street, about 0.8 mile away).⁹⁰

The proposed project would result in an increase in demand for fire suppression and emergency medical service in the project area. However, the increase would be incremental and would not be in excess of amounts expected and provided for in the project area. Nor would the proposed project necessitate the need for new or physically altered facilities or significantly increased staff. Therefore, the proposed project would not be expected to have any substantial impact on fire services, and fire and emergency medical services will not be discussed further in the EIR.

Police Protection

The San Francisco Police Department (SFPD), headquartered at 850 Bryant Street, provides police protection for the City and County of San Francisco including the project site. The SFPD consists of four Bureaus and 10 Districts located throughout the City. The Southern Police Station, also located at 850 Bryant Street, has jurisdiction over the project site and vicinity.⁹¹

The increased employment and site visitors resulting from the proposed project would result in an increase in demand for police service calls. However, this increase would not be in excess of amounts expected and provided for in the project area, nor would it require the construction of any new police facilities. The proposed project would, therefore, not adversely affect police protection services in the project vicinity. Thus, this impact would be less than significant, and police services will not be discussed in the EIR.

⁸⁹ California Integrated Waste Management Board, Active Landfill Profiles, Altamont Landfill, <http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=3&FACID=01-AA-0009>, accessed January 17, 2007.

⁹⁰ San Francisco Fire Department, http://www.sfgov.org/site/fire_index.asp?id=4455 (Fire Station Location), accessed January 17, 2007; distances calculated with www.mapquest.com.

⁹¹ San Francisco Police Department http://www.sfgov.org/site/police_index.asp?id=19969, accessed May 24, 2006.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
12. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Questions 12a through 12d: The project site is located in the downtown area of San Francisco and is completely developed with three buildings; there is no landscaping or vegetation on the site. The sponsor would retain the existing street trees adjacent to the project site along Market Street. Given the conditions present on the project site and in the area, the proposed project would not affect a rare or endangered plant or animal species or habitat, riparian habitat or sensitive natural communities, or wetlands. For similar reasons, the proposed project would not interfere with wildlife movement or impede the use of nursery sites.

Question 12e: The Planning Department, Department of Building Inspection (DBI), and Department of Public Works (DPW) have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees, including street trees, is implemented. DPW Code Section 8.02-8.11 requires disclosure and protection of Landmark, Significant, and street trees, collectively known as "protected trees" located on private and public

property. There are no trees on the project site, and therefore, no trees would be removed with the proposed project. Adjacent street trees along Market Street would remain and as required by DPW, would be protected during construction. Given the above, the proposed project would not conflict with the local tree preservation ordinance, or with any local policies or ordinances protecting trees. For the reasons noted above, the proposed project would not conflict with any other local policies or ordinances protecting other biological resources.

Question 12f: There are no adopted habitat conservation plans that include the project site or vicinity. Therefore, this topic is not applicable.

The proposed project would not affect biological resources, and therefore, this topic will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 13a: A preliminary geotechnical analysis was prepared for the project site; the results and recommendations are summarized below.⁹² The purpose of a geotechnical investigation is to explore subsurface conditions and develop recommendations regarding the geotechnical aspects of project design and construction. Where explored, geotechnical investigation of the project site and adjacent properties indicates the subsurface presence of fill, sand, and bedrock. The fill layer at the site is 10 to 20 feet deep (less where there are existing basements), consists of loose to medium dense sand, and may contain construction debris. Under the fill layer is loose to medium dense native sand, known as Dune sand, to depths of 20 to 33 feet. The underlying bedrock is known as the Colma Formation, and consists of sand with variable clay content and clay with variable sand content. In addition, a marsh layer of loose to medium dense clayey sand, five to seven feet thick, was encountered in borings near the project site at 30 to 35 feet below the ground surface. Excavation for the proposed project would be up to about 41 feet deep⁹³ (about 31 feet deeper than the existing basement). Approximately 50,500 cubic yards of soil would be removed from the site, taking into account the approximately 6,315 sq. ft. of unexcavated area at the B3 level of the proposed building.

The project site is occupied by three two- to five-story buildings that all have basements. BART and Muni rail tunnels underlie Market Street about 25 feet north of the project site. Groundwater levels, which fluctuate with the season, have been estimated at depths of approximately 30 to 35 feet below the ground surface in the area. Where present, groundwater may be perched above the marsh deposit layer. Groundwater produced during construction dewatering would be discharged to the combined sewer system in accordance with Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170, which regulates the quantity and quality of discharges to the combined sewer system. This permit would contain appropriate discharge standards and may require installation of meters to measure the volume of the discharge. As part of its Water Pollution Prevention Program, the Environmental Regulation and Management Department of the San Francisco Public Utilities Commission (SFPUC) must be notified of projects necessitating dewatering, and may require water analysis before discharge.

Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. The report would contain a determination as to whether a lateral movement and settlement survey should be done prior to dewatering to monitor for any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the San Francisco Building Code) be retained by the project sponsor to

⁹² Treadwell & Rollo, *Preliminary Geotechnical Study, 949 Market Street and Adjacent Parcels, San Francisco, California*, March 9, 2005. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2005.1074E.

⁹³ Approximately 37 feet would be for the three subsurface levels, plus four feet for foundations.

perform this monitoring. Groundwater observation wells would be installed to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during dewatering, groundwater recharge would be used to halt this settlement. Costs for the survey and any necessary repairs to service lines under the streets would be borne by the project sponsor. In addition, BART guidelines for construction near their subway structures include monitoring of dewatering for any changes in groundwater level and requiring recharge if the existing groundwater level is expected to drop by more than two feet.

The project site is not located within an Alquist-Priolo Earthquake Fault Zone as defined by the California Department of Conservation Division of Mines and Geology (CDMG), and no active or potentially active faults exist on or in the immediate vicinity of the site.⁹⁴ Therefore, the potential for surface fault rupture is very low, and there would be no project impact.

The project site is located approximately seven miles from the San Andreas Fault, 11 miles from the Hayward Fault, 11 miles from the San Gregorio Fault, 22 miles from the northern Calaveras Fault, and 22 miles from the Rodgers Creek Fault. It is likely that the site will experience periodic minor earthquakes and possibly a major (moment magnitude⁹⁵ [Mw] greater than 7.0) earthquake on one or more of the nearby faults during the life of the proposed development. The Association of Bay Area Governments (ABAG) has prepared maps that show areas of the City subject to ground shaking during an earthquake. The project site is in an area subject to “very strong” ground shaking from a major earthquake along the Peninsula segment of the San Andreas Fault, and subject to “strong” ground shaking from a major earthquake along the northern Hayward Fault.⁹⁶

The project site is also located in an area of liquefaction potential, in a Seismic Hazards Study Zone (SHSZ) designated by the California Division of Mines and Geology. However, it is not within an area prone to seismically induced landslides. For any development proposal in an area of liquefaction potential, the Department of Building Inspection (DBI) will, in its review of the building permit application, require the project sponsor to prepare a geotechnical report pursuant to the State Seismic Hazards Mapping Act. The report would assess the nature and severity of the hazard(s) on the site and recommend project design and construction features that would reduce the hazard(s). As stated above, the project sponsor has provided a geotechnical investigation report prepared by a California-licensed geotechnical engineer that is on file with the Planning

⁹⁴ California Geological Survey, Table 4, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of May 1, 1999, from <http://www.conservation.ca.gov/cgs/rghm/ap/affected.htm>, accessed January 11, 2007.

⁹⁵ Moment magnitude is an energy-based scale and provides a physically meaningful measure of the size of a faulting event. Moment magnitude is directly related to average slip and fault rupture area.

⁹⁶ Association of Bay Area Governments, Hazard Maps, Shaking Maps, 2003, accessed through www.abag.ca.gov (go to Environment/Earthquake Maps/Shaking Maps/Interactive Shaking Maps), January 11, 2007.

Department and available for review as part of the project file. Review of available borings at the site and vicinity indicates that the soil beneath the groundwater has sufficient strength and/or cohesion to resist liquefaction.⁹⁷ The geotechnical investigation concludes that the potential for soil liquefaction and lateral spreading at the site is low.

To ensure compliance with all *San Francisco Building Code* provisions regarding structural safety, when DBI review the geotechnical report and building plans for a proposed project, it will determine necessary engineering and design features for the project to reduce potential damage to structures from groundshaking and liquefaction. DBI could require that additional site-specific soils report(s) be prepared in conjunction with the building permit applications. Therefore, potential damage to structures from geologic hazards on a project site would be mitigated through the DBI requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the *Building Code*. Any changes incorporated into the foundation design required to meet the *Building Code* standards that are identified as a result of the DBI permit review process would constitute minor modifications of the project and would not require additional environmental analysis.

Based on these identified hazards, the project site's proximity to the subway tunnels, and the proposed project's height and below-grade depth, the geotechnical report includes several recommendations, including recommendations for the proposed project's foundation. The geotechnical report concluded that a mat foundation could be used. In general, the geotechnical report found the site suitable for development providing that the recommendations included in the report were incorporated into the design and construction of the proposed development.⁹⁸ The sponsor has agreed to follow the recommendations of the report in constructing the proposed project.

Given the proximity of the subway tunnels, BART would review the structural plans and calculations during final design. The proposed project would be required to demonstrate that the nearby tunnels would not be adversely affected by soil rebound (heaving) or vibration during excavation, settlement during and after building construction, soil deformations during seismic loading, or excessive lateral loads from the buildings.

Based on the information in the Preliminary Geotechnical Study and on required reviews by technical experts, the proposed project would not be significantly impacted by its location in proximity to geological hazards and this topic will not be discussed further in the EIR.

⁹⁷ Treadwell & Rollo, 2005, p. 5.

⁹⁸ Treadwell & Rollo, 2005, pp. 4-7 and 9.

Question 13b: Soil movement for foundation excavation could create the potential for wind- and water-borne soil erosion. The proposed project would require Department of Public Works approval of a grading permit and analysis for efficient stormwater management during project construction and operation. Review of the stormwater runoff from the proposed project's construction and operation, in accordance with the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant, would ensure that significant soil erosion would not occur. Therefore, soil erosion will not be discussed further in the EIR.

Questions 13c-13d: As indicated above under the response to Question 13a, the geotechnical investigation concludes that the potential for soil liquefaction and lateral spreading at the project site is low. The project sponsor and project contractors would follow City and DBI protocol and requirements with respect to project design and construction features for structural safety. Similarly, as indicated above under the response to Question 13a, the project site is not located within an area prone to seismically-induced landslides. The potential presence of a marsh deposit and construction debris within the fill could cause some instability within the subsurface materials. Implementation of the site preparation and construction recommendations provided in the geotechnical engineering investigation report, as would be routinely required as part of the building permit process, would reduce these risks to less-than-significant levels. Among these measures, the geotechnical report recommends that shoring be used during site excavation, and that if a marsh deposit is found, it be overexcavated and replaced with engineered fill or lean concrete. The geotechnical report did not identify any issues with respect to expansive soils. These issues will not be discussed further in the EIR.

Question 13e: The proposed building would connect to existing wastewater conveyance, treatment, and disposal facilities, and would not rely on septic tanks or other on-site land disposal systems. Therefore, this issue is not applicable to the project site.

Question 13f: The project site is completely developed with three buildings. Therefore, the proposed project would not affect the topography of the project site or any unique geologic or physical features, and this topic will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
14. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Questions 14a & 14f: Domestic wastewater from the project site currently, and would continue to, flow to the City's combined sewer system, where it would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge. During dry weather (typically, May 1 to October 15), all sanitary sewage generated at the project site would be treated at the Southeast Plant, which currently operates at about 80 percent of its design capacity. The additional dry weather flow associated with the proposed project could be accommodated within the system's

existing capacity. During wet weather (typically, October 16 to April 30), the combined sewer system collects large volumes of stormwater runoff and other facilities in the City provide additional treatment as needed prior to discharging treated effluent to the Bay.⁹⁹ When combined flows exceed the total capacity of all of the facilities, excess flows receive primary treatment and are discharged through combined sewer overflow (CSO) structures located along the Bayside waterfront.^{100,101} These intermittent CSO discharges occur in compliance with the current NPDES permit.

The SFPUC is preparing sewage and stormwater management guidelines for new developments to develop a systematic, citywide approach for stormwater management systems and to ensure continued compliance with water quality regulations and protection of the Bay and ocean. The guidelines, similar to those being initiated by other Bay Area communities, will address site design, source control, and structural treatment controls, to improve the quality of runoff generated as well as to reduce the quantity.¹⁰²

Discharge of typical retail wastewater to this existing wastewater treatment system would not violate any water quality standards or waste discharge requirements and would be within the capacity of the Southeast Water Pollution Control Plant. During wet weather, any net increase in combined sewage could cumulatively contribute to an increase in the average volume of CSO discharges to the Bay. Such an increase could be a concern because the RWQCB has designated this portion of the Bay as an impaired water body under Section 303(d) of the Clean Water Act, which indicates water quality standards are not expected to be met after implementation of technology-based effluent limitations, and because CSO discharges contain pollutants for which the Bay is impaired. However, the City is undertaking a number of measures to reduce the quantity and frequency of overflows and improve the water quality of overflows. In light of these efforts, the proposed project and cumulative impacts of the proposed project on stormwater runoff would be less than significant, and this topic requires no further discussion in the EIR.

⁹⁹ San Francisco Public Utilities commission, Wastewater System Reliability Assessment, Summary Report, Draft December 2003, <http://www.sfsewers.org/library.asp#Background>, accessed January 11, 2007.

¹⁰⁰ San Francisco Sewer System Master Plan Project, Combined Sewer Overflows, <http://www.sfsewers.org/combinedseweroverflows.asp?groupid=10398>, accessed January 11, 2007.

¹⁰¹ San Francisco Public Utilities Commission, Recycled Water Master Plan, March 2006, p. 34. Available on the SFPUC web site at http://sfwater.org/detail.cfm/MC_ID/13/MSC_ID/165/MTO_ID/290/C_ID/2920/Keyword/recycled%20water%20master%20plan, accessed January 11, 2007.

¹⁰² SFPUC, "Low Impact Development - Greening Stormwater Management in San Francisco," at <http://sfwater.org/home.cfm> (Wastewater/ Stormwater Management), accessed January 17, 2007.

Question 14b: The project site is developed and completely covered with impervious surfaces, namely existing structures. The proposed project would not change the amount of impervious surface on the site. The existing water supply to the project site is provided from reservoirs in the SFPUC water system.

Project development would require excavation up to a depth of approximately 41 feet. As discussed in Topic 13: Geology and Soils, p. 75, groundwater is estimated in the project area at approximately 30 to 35 feet below the ground surface. Therefore, the proposed excavation would likely require dewatering at the site. Groundwater produced during construction dewatering would be discharged to the combined sewer system in accordance with Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170, which regulates the quantity and quality of discharges to the combined sewer system. This permit would contain appropriate discharge standards and may require installation of meters to measure the volume of the discharge. As part of its Water Pollution Prevention Program, the Environmental Regulation and Management Department of the SFPUC must be notified of projects necessitating dewatering, and may require water analysis before discharge.

Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. The report would contain a determination as to whether a lateral movement and settlement survey should be done prior to dewatering to monitor for any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the San Francisco Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during dewatering, groundwater recharge would be used to halt this settlement. Costs for the survey and any necessary repairs to service lines under the streets would be borne by the project sponsor. In addition, BART guidelines for construction near their subway structures include monitoring of dewatering for any changes in groundwater level and requiring recharge if the existing groundwater level is expected to drop by more than two feet.

In view of the above, the proposed project would not have a significant impact regarding groundwater supplies or levels, and this topic will not be discussed further in the EIR.

Questions 14c through 14e: There are no surface water channels on the project site. Although the proposed project development would occur within an area that is already developed, construction activities such as earthwork could lead to erosion when soil is exposed, particularly during wet weather. During construction, measures to reduce potential erosion would be implemented pursuant to California Building Code Chapter 33, Excavation and Grading, including an analysis for efficient stormwater management during construction and operation of

the proposed project. For these reasons, significant water quality impacts with respect to erosion and siltation would not occur, and this topic will not be analyzed in the EIR.

Development in the City and County of San Francisco must account for flooding potential. Areas located on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather) and there can be backups or flooding near these streets and sewers. The project site falls within an area in the City prone to flooding during storms, especially where ground stories are located below an elevation of 0.0 City Datum or, more importantly, below the hydraulic grade line or water level of the sewer.

The City has implemented a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers. Applicants for building permits for either new construction, change of use (Planning) or change of occupancy (Building Inspection), or for major alterations or enlargements are referred to the SFPUC for a determination of whether the project would result in ground-level flooding during storms. The side sewer connection permits for these projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, the Department of Building Inspection, or the Redevelopment Agency. The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The SFPUC will receive and return the application within a two-week period from date of receipt. The permit applicant shall refer to PUC requirements for information required for the review of projects in flood-prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters.

As required, the project sponsor has initiated a review with SFDPW to determine if the project would result in ground-level flooding during storms. SFDPW has determined that the area of 935-965 Market Street between Fifth and Sixth Streets has not generated any reports of street flooding due to heavy storms. SFDPW recommends that the ground floor of the proposed building be at the elevation of the official grade and that the new sidewalk, if any, be constructed with a six-inch-height curb as well as proper cross slope from the property line to the curb. The project sponsor will incorporate these recommended construction measures. In addition, the sponsor will submit preliminary plans showing proposed side sewer connections to the city's sewer main to SFDPW for review and approval.¹⁰³

¹⁰³ Wong, Clifford, SFDPW, written communication with Sean Thompson, Urban Realty Co., Inc., September 9, 2008. This information is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File No. 2005.1074E.

Therefore, the proposed project would not substantially affect or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site or exceed the capacity of existing or planned stormwater drainage and wastewater systems, and surface runoff and drainage effects will not be analyzed further in the EIR.

Questions 14g-14h: Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers (Corps). The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City and County of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1 percent chance of occurrence in a given year (also known as a “base flood” or “100-year flood”). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area (“SFHA”).

Because FEMA has not previously published a FIRM for the City and County of San Francisco, there are no identified SFHAs within San Francisco's geographic boundaries. FEMA has completed the initial phases of a study of the San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco for review and comment by the City. The City has submitted comments on the preliminary FIRM to FEMA. FEMA anticipates publishing a revised preliminary FIRM in 2009, after completing the more detailed analysis that Port and City staff requested in 2007. After reviewing comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes.

FEMA has tentatively identified SFHAs along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).¹⁰⁴ On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in flood prone areas of San Francisco, and to authorize the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing

¹⁰⁴ City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf, accessed July 31, 2008.

the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally-backed flood insurance by FEMA.

Once the Board of Supervisors adopts the Floodplain Management Ordinance, the Department of Public Works will publish flood maps for the City, and applicable City departments and agencies may begin implementation for new construction and substantial improvements in areas shown on the Interim Floodplain Map. According to the preliminary map, the project site is not located within a flood zone designated on the City's interim floodplain map. In addition, there are no natural waterways within or near the project site that could cause stream-related flooding. Therefore, no impacts related to placement of housing or other structures in a 100-year flood zone would occur, and this topic will not be analyzed in the EIR.

Question 14i: The project site is not located within an area that would be flooded as the result of failure of a levee or dam.¹⁰⁵ Therefore, no impact would occur.

Question 14j: The project site is not located within an area that is subject to inundation by seiche, tsunami, or mudflow.¹⁰⁶ Therefore, no impact would occur.

¹⁰⁵ Dam Failure Inundation Hazard Map for San Francisco, through <http://www.abag.ca.gov> (Environment/Earthquake Maps/ Dam Failure after Earthquakes), accessed January 11, 2007.

¹⁰⁶ <http://www.abag.ca.gov/bayarea/cqmaps/tsunami/tsunami.html>, accessed January 11, 2007; also .20-Foot Tsunami Run-Up Map, http://www.sfgov.org/site/uploadedimages/planning/Codes/General_Plan/images/csa_Map6.gif, accessed January 11, 2007.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
15. HAZARDS AND HAZARDOUS MATERIALS Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 15a: During operation, the proposed project would result in an increase in routine commercial use of small quantities of common types of hazardous materials, such as paints, cleaners, solvents, and disinfectants. All of these products are labeled to inform users of risks, and instruct them in proper disposal methods. Most of these materials are consumed or neutralized through use, resulting in little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials, providing safety information, and adequately training workers in hazardous material handling. For these reasons, hazardous material use by the proposed project would not pose a substantial public health or safety hazard, and this topic will not be discussed further in the EIR.

Question 15b & 15d: The following discussion focuses on the potential for exposure to hazardous materials in soil or groundwater beneath the project site, or in the existing buildings on the site.

Potential Impacts Related to Materials in Soil or Groundwater

Project construction would include the removal of existing basements and excavation of soil for three subsurface levels and the building foundation. Excavation would extend up to about 41 feet below the ground surface, and would result in the removal of about 50,500 cubic yards of soil.

Hazardous Materials Studies. Three Environmental Site Assessments (ESAs) and a limited environmental site characterization have been prepared for the project site, including Phase I Environmental Site Assessments for 935-939, 941-945, and 947-965 Market Street. A Phase I Environmental Site Assessment Update was prepared for 935-939 Market Street in 2004 (“935-939 Phase I Update”) that updates site assessments prepared in 1997 and 1999.¹⁰⁷ A Phase I Environmental Site Assessment was prepared for 941-945 Market Street in 2005 (“941-945 Phase I”).¹⁰⁸ In addition to a Phase I Environmental Site Assessment that was prepared for 947-965 Market Street in 2005 (“947-965 Phase I”), a limited environmental site characterization was prepared in 2006 (“949 Market Environmental Site Characterization”).^{109,110}

ESAs provide a record of the hazardous material conditions of the subject property and evaluate what, if any, hazardous-material-related issues exist at the site. They include record searches of local, State, and Federal hazardous material databases; research of a site’s historical land use; and site reconnaissance to assess the potential for adverse environmental impacts from the current and historical practices on the site and in the surrounding area. All of the Phase I studies prepared for the project site included this information. In addition, the 947-965 Phase I included the results of five soil samples from existing soil stockpiles within the ground floor and basement of the

¹⁰⁷ AllWest Environmental, Inc., *Environmental Site Assessment Update, Commercial Building, 939 Market Street, San Francisco, California*, April 23, 2004. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2005.1074E.

¹⁰⁸ AllWest Environmental, Inc., *Environmental Site Assessment, 943 Market Street, San Francisco, California*, October 18, 2005. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2005.1074E.

¹⁰⁹ AllWest Environmental, Inc., *Environmental Site Assessment, 949 Market Street (951-965 Market Street), San Francisco, California*, March 25, 2005. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2005.1074E.

¹¹⁰ Treadwell & Rollo, *Limited Environmental Site Characterization, 949 Market Street, San Francisco, California*, November 27, 2006 (hereafter “949 Market Environmental Site Characterization”). This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of Case File 2005.1074E.

building, and the *949 Market Environmental Site Characterization* reported on the results of soil samples from three exploratory borings on site.

Past Uses of Hazardous Materials. The 935-939 and 941-945 Market Street parcels were occupied by residential, restaurant and retail land uses in the late 19th century, were redeveloped into commercial use in the early 1900s, and have been in retail and office use since that time. The 947-965 Market Street parcel contained a dry goods store and warehouse in the late 1800s and was redeveloped with the existing building in 1909. The existing building has been occupied by various stores, offices, a billiards hall, a gym, a bath house, and a theater. The types of historical uses at all three parcels on the project site generally would not have contributed hazardous wastes to soil or groundwater.¹¹¹

The ESAs did not identify any regulatory or physical evidence of underground storage tanks (USTs) at the 935-939 Market or 941-945 Market parcels. A 100-gallon above-ground hydraulic oil tank related to the elevator in the building was present at the 941-945 Market parcel at the time of the site reconnaissance, but no leaks or spills associated with the tank were observed. A heating oil UST was removed from beneath the Stevenson Street sidewalk just south of the 947-965 Market parcel in 2000. The tank was observed to be in poor condition, but soil samples taken with the removal did not detect any petroleum hydrocarbons or significant amounts of other hazardous materials. The San Francisco Department of Public Health granted regulatory case closure to the UST site in 2000.¹¹²

The 935-939 and 941-945 Market Street buildings are partly vacant and occupied by retail and office uses; the 947-965 Market Street building is entirely vacant. The types of hazardous materials associated with the remaining uses would be those typical of office and retail uses. At the time of the ESAs, no hazardous materials were observed other than typical cleaning and maintenance supplies.¹¹³

Regulatory database reviews were prepared by Environmental Data Resources, Inc, and incorporated into the ESAs. The reviews found that none of the parcels on the project site were listed on the State of California Hazardous Waste and Substances Site list. The reviews found that the 935-939 Market parcel was on the State of California Hazardous Waste Information

¹¹¹ AllWest Environmental Inc., *935-939 Phase I Update*, p. 9; *941-945 Phase I*, p. 7; *947-965 Phase I*, p. 10.

¹¹² AllWest Environmental Inc., *935-939 Phase I Update*, pp. 2, 7; *941-945 Phase I*, p. 12; *947-965 Phase I*, p. 2.

¹¹³ AllWest Environmental Inc., *935-939 Phase I Update*, p. 2; *941-945 Phase I*, p. 2; *947-965 Phase I*, p. 2.

System (HAZNET) list for off-site disposal of asbestos-containing waste.¹¹⁴ The 941-945 Market parcel was not identified on any of the lists of potential hazardous materials use or releases included in the reviews. The 945-965 Market Street parcel was on the State of California registered leaking underground storage tank (LUST) database, due to the removal of the UST (discussed above) that was located beneath the public sidewalk at the rear of the property.

For the surrounding area, the database reviews in the ESAs indicated nine cases of LUSTs within one-eighth of a mile of the project site. The inactive LUST cases nearest to the project site are located at 416 Jessie Street, 870 Market Street, 1035 Market Street, 925 Mission Street, and 238 Eddy Street. All of these LUST sites have been granted closure (no further investigation or remediation required) by San Francisco Department of Public Health. Therefore, the reviewed hazardous materials files for the project site and surrounding properties do not indicate a hazard to the development of the project site. Further soil testing was recommended only for the 947-965 Market Street parcel, because a UST was removed from beneath the Stevenson Street sidewalk just south of this parcel in 2000 and soil testing results reported slightly elevated levels of lead, low levels of petroleum hydrocarbons, as well as trace levels of most other metals in the 947-965 Phase I.¹¹⁵ Overall, reviews of nearby properties indicated that none of the properties surrounding the project site had the potential to affect conditions at the project site.¹¹⁶

The project site is located in an area known to contain fill materials from the 1906 earthquake and fire.¹¹⁷ Geotechnical investigation of the project site also indicates the subsurface presence of fill; the fill layer is estimated to extend 10 to 20 feet below the ground surface (less where there are existing basements), consists of loose to medium dense sand, and may include construction debris (Topic 13: Geology and Soils, p. 75). Such fill may therefore contain elevated concentrations of metals and petroleum hydrocarbons. The following is a discussion of soil testing that has occurred on the project site.

¹¹⁴ On a site visit on October 4, 1999, AllWest observed old boiler equipment and old vinyl flooring in a stair landing that were not removed during the extensive 935-939 Market Street building remodel in 1981 and were suspected of having asbestos containing materials (ACM). However, on a subsequent site visit on April 5, 2004, AllWest did not observe any building materials or equipment that were suspected of containing ACM. See AllWest Environmental, Inc., *Environmental Site Assessment, 939 Market Street, San Francisco, California*, March 24, 1997; and *Environmental Site Assessment Update, Office Building, 939 Market Street, San Francisco, California*, October 15, 1999. These reports are on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and are available for public review, by appointment, as part of Case File 2005.1074E.

¹¹⁵ AllWest Environmental, Inc., *941-945 Phase I*, p. 2.

¹¹⁶ AllWest Environmental Inc., *935-939 Phase I Update*, pp. 3-9; *941-945 Phase I*, pp. 13-19; *947-965 Phase I*, pp. 17-24.

¹¹⁷ Department of Public Health, Environmental Health Hazardous Waste Program, Maher Sites Map available at <http://www.sfdph.org/dph/comupg/oprograms/EHS/HazWaste/MaherSiteMap.asp>.

Soil Testing at 947-965 Market Street Site. At the time of the site reconnaissance, the ground floor and basement levels of the 947-965 Market Street parcel contained several soil stockpiles that had been generated as part of prior excavation activities. Therefore, in 2005 five composite soil samples were taken and tested from the stockpiles. The results were compared to background concentrations and State of California hazardous waste classification criteria. The soil testing found low levels of petroleum hydrocarbons including diesel and motor oil, and trace levels of most metals; lead was found at higher than trace levels in the stockpiles.¹¹⁸

Slightly elevated levels of lead were detected in three of the five stockpile samples. The highest concentration of lead detected at the ground floor and basement levels of the 947-965 Market Street parcel was 98 ppm (parts per million).¹¹⁹ These lead concentrations exceeded the threshold used by landfills for acceptance of soil disposal, but did not exceed the California hazardous waste threshold.

In part because lead was found in the basement stockpiles, an additional study was carried out for this site in 2006. The *949 Market Environmental Site Characterization* was prepared to “determine the environmental quality of soil likely to be encountered during the proposed new construction activities.” The soil samples were collected from borings at depths ranging from 11.5 to 50.2 feet below the ground surface. Nine samples were analyzed for the presence of petroleum hydrocarbons and heavy metals. The results of the testing are as follows:¹²⁰

- No petroleum hydrocarbons were detected at or above method reporting limits in any of the samples tested.
- Total lead was detected at concentrations ranging from “not detected” to 9.6 mg/kg. The results were substantially lower than the results of the earlier testing, which was conducted on soil in the stockpiles rather than soil from borings taken under the project buildings.
- All other test results were considered to be within normal background levels.

The *949 Market Environmental Site Characterization* concludes that “Based on the analytical results of the soil samples...the excavated soil will most likely be disposed of as unregulated waste.”¹²¹

Conclusions. The Phase I studies for the 935-939 and 941-945 Market Street sites found no evidence of potential sources of contamination in the soil or groundwater beneath those sites, and concluded that no further assessment was warranted. The Phase I study for the 947-965 Market Street site found elevated levels of lead in the soil stockpiles present. The stockpiled soil would be disposed of appropriately prior to demolition of the basement of the 947-965 Market Street

¹¹⁸ AllWest Environmental Inc., *947-965 Phase I*, pp. 11-12.

¹¹⁹ AllWest Environmental, Inc., *941-945 Phase I*, p. 2.

¹²⁰ Treadwell & Rollo, *949 Market Environmental Site Characterization*, pp. 2-3 and Tables 1 and 2.

¹²¹ *Ibid*, p. 3.

building, as required based on the lead levels found. The more recent, subsurface testing for the 947-965 Market Street building did not find any significant amounts of soil contamination that would require special disposal procedures.

Although soil testing of a portion of the site did not indicate elevated amounts of lead, the project site is located in an area known to contain 1906 earthquake-related fill. Therefore, soil with hazardous concentrations of metals or petroleum hydrocarbons could be encountered during site development, and excavated soil during the proposed project construction should be tested for metals and petroleum hydrocarbons so that the soil can be handled properly for reuse or disposal. Mitigation Measure Haz-1 (identified on pp. 101-102) has been included to address the need for additional soil testing, and if applicable, a mitigation plan and handling/hauling/disposal plan that would remediate the soil on the project site, if required. With the implementation of Mitigation Measure Haz-1, the proposed construction of the project would not have the potential to pose a direct or indirect public health hazard to the surrounding neighborhood, and the potential impact would be less than significant. This topic will not be discussed further in the EIR.

Potential Impacts Related to Building Materials

The proposed project would involve demolition and removal of the existing three buildings. Given the age of the existing structures (which were built *circa* 1909 to 1926), lead-based interior or exterior paint, asbestos-containing building materials, and polychlorinated biphenyls (PCBs) related to fluorescent lighting may be present.

Lead-Based Paint

Work that could result in the disturbance of lead paint must comply with Section 3407 of the *San Francisco Building Code (Building Code)*, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead-based paint on the exterior of any building built prior to December 31, 1978, Chapter 34 Section 3407 requires specific notification and work standards, and identifies prohibited work methods and penalties. (The reader may be familiar with notices commonly placed on residential and other buildings in San Francisco that are undergoing re-painting. Generally affixed to a drape that covers all or portions of a building, these notices are a required part of the Section 3407 notification procedure.)

Section 3407 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and childcare centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban

Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards), and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean-up standards require the removal of visible work debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

Section 3407 also includes notification requirements and requirements for signs. Prior to commencement of work, the responsible party must provide written notice to the Director of the DBI of the location of the project; the scope of work including specific location; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property, the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. The code contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance. Compliance with these regulations and procedures required by the *Building Code* would ensure that potential impacts related to the demolition and renovation of structures with lead-based paint are less than significant. This topic will not be analyzed in the EIR.

Asbestos

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified 10 days in advance of any proposed demolition or abatement work.

Required notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished or altered including its size, age and prior use, and the approximate amount of friable (subject to crumbling) asbestos; scheduled start and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, BAAQMD will inspect any removal operation for which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in Title 8, Sections 341.6 through 341.14, and Section 1529 of the California Code of Regulations where there is asbestos-related work involving 100 square feet or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and its disposal. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the notice requirements described above. These regulations and procedures, already established as a part of the permit review process, would insure that any potential impacts due to asbestos would be reduced to a level of insignificance.

PCBs and Other Building Materials

Electrical power to the project site is directed through Pacific Gas & Electric (PG&E) transformers located in vaults beneath the sidewalks at Market and Stevenson Streets. The original PCB-containing transformers were removed in August 1985 and replaced with silicone-filled transformers.¹²² Therefore, no PCB-containing electrical equipment was noted at the three building sites.

The *935-939 Phase I Update* noted that fluorescent light fixtures were present within the building. PCB-containing ballasts were present in many fixtures manufactured prior to 1978. Building management stated that all of the light ballasts had been replaced with non-PCB-containing equipment, and it is likely that many such fixtures have been replaced since the late 1970's. Without replacement records, however, it is not known whether there may be light ballasts with PCB-containing oils remaining in one or more of the buildings.

Spent fluorescent light tubes commonly contain mercury vapors at levels high enough to be considered a hazardous waste under California law; depending on the levels of mercury present, the light tubes may also be classified as hazardous under Federal law. These and other potentially hazardous building materials could pose health risk for site workers if improperly handled. However, adherence to applicable laws and regulations for removal and disposal of these materials would reduce the potential for exposure to hazardous substances during demolition activities. Therefore, this impact would be less than significant and no further analysis is necessary in the EIR.

¹²² AllWest Environmental Inc., *935-939 Phase I Update*, Appendix B (1997 Phase I), p. 7; *941-945 Phase I*, p. 11; *947-965 Phase I*, p. 15.

Question 15c: At least one school (De Marillac Academy, a private school located at 175 Golden Gate Avenue) is within one-quarter mile of the project site. The proposed project would result in an increase in the retail uses present at the site. These uses would not involve the handling of acutely hazardous materials, substances, or waste or the emissions of hazardous materials during project operation. For the reasons noted in the discussion of Questions 15a and 15b, the potential impacts related to exposure to hazardous substances during project construction would be less than significant, and no further analysis of the proposed project in relation to school sites is required.

Questions 15e-15f: The project site is not located within an airport land use plan, within two miles of a public airport, or within the vicinity of a private airstrip. Therefore, these topics are not applicable to the proposed project.

Questions 15g and 15h: The proposed project would not change the existing traffic circulation network in the vicinity. Employees of or visitors to the proposed building would contribute to congestion if an emergency evacuation of the downtown area were required.

Section 12.202(e)(1) of the *San Francisco Fire Code* requires that all owners of high-rise buildings (over 75 feet) "shall establish or cause to be established procedures to be followed in case of fire or other emergencies. All such procedures shall be reviewed and approved by the chief of division." The proposed project would conform to these standards. Therefore, proposed project impacts related to interference with emergency response or evacuation plans would be less than significant.

San Francisco ensures fire safety primarily through provisions of the *Building Code* and the *Fire Code*. The proposed project would be required to conform to those provisions, which include additional life-safety protections for high-rise buildings. Therefore, the proposed project would have no significant impacts related to fire hazards and this topic will not be discussed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
16. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Questions 16a-16b: All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and II). This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the site is not a designated area of significant mineral deposits. Since the project site is already developed, future evaluation or designation of the site would not affect or be affected by the proposed project. The project site and vicinity do not contain any known mineral resources. There are no designated mineral resource recovery sites in the project area whose operations or accessibility would be affected by the construction or operation of the proposed project. Thus, the proposed project would have no impact on mineral resources, and this topic will not be discussed further in the EIR.

Question 16c: The proposed project would not result in the use of large amounts of fuel, water, or energy in the context of energy use throughout the City and region. The project demand would be typical for a project of this scope and nature and would meet, or exceed, current State and local energy conservation standards, including Title 24 of the California Code of Regulations enforced by the Department of Building Inspection. Therefore, the proposed project would not result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. This topic will not be discussed further in the EIR.

The proposed project would use energy produced in regional power plants using hydropower and natural gas, coal, and nuclear fuels. The proposed project would not use substantial quantities of other non-renewable natural resources. Therefore, the proposed project would not have a substantial effect on the use, extraction, or depletion of a natural resource. This topic will not be evaluated in the EIR.

San Francisco consumers have recently experienced rising energy costs and uncertainties regarding the supply of electricity. The root causes of these conditions are under investigation and are the subject of much debate. Part of the problem may be that the State does not generate sufficient energy to meet its demand and must import energy from outside sources. Another part of the problem may be the lack of cost controls as a result of deregulation. The California Energy Commission (CEC) is considering applications for the development of new power-generating facilities in San Francisco, the Bay Area, and elsewhere in the State. These facilities could supply additional energy to the power supply "grid" within the next few years. These efforts, together with conservation, will be part of a statewide effort to achieve energy sufficiency. The demand for electricity generated by the proposed project would be negligible in the context of overall demand within San Francisco and the State, and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would not result in a significant physical environmental effect or contribute to a cumulative impact.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
17. AGRICULTURE RESOURCES					
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.					
Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Questions 17a through 17c: The project site is developed and is located within an urbanized area in the City and County of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the project site as "Urban and Built-up Land."¹²³ Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, unique farmland or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with any existing agricultural zoning or a Williamson Act contract; nor would it involve any changes to the

¹²³ California Department of Conservation, Farmland Mapping and Monitoring Program, 2002.

environment that could result in the conversion of farmland. Accordingly, this topic is not applicable to the project site and will not be addressed further in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
18. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 18a: The proposed project could result in adverse impacts to the environment with respect to transportation and noise. These topics will be addressed in the EIR. As noted in this Initial Study above, the proposed project would not result in significant impacts on biological resources or important examples of major periods of California history. Mitigation measures have been included in the project to reduce potential impacts on major periods of California prehistory to a less-than-significant level.

Question 18b: The proposed project could have cumulative impacts, primarily with respect to increased traffic congestion. These impacts will be addressed in the EIR.

Question 18c: Potential adverse effects on human beings have been considered as part of the analysis of individual environmental topics in this Initial Study. Potential impacts on humans with respect to transportation and air quality will be addressed in the EIR. The project would not have any other environmental effects that would cause substantial adverse effects on humans.

F. MITIGATION MEASURES

Although the following mitigation measures relate to topics that will not receive additional analysis in the EIR, the EIR will contain a Mitigation Measures chapter that describes all mitigation measures for the proposed project, including those listed below. The project sponsor has agreed to implement the following mitigation measures, which are necessary to reduce potential construction air quality, archaeological resources, and hazardous materials/contaminated soil impacts to a less-than-significant level.

Mitigation Measure AQ-1: Construction Air Quality

The project sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

The project sponsor shall require the construction contractor(s) to implement one or more additional measures to reduce construction exhaust emissions of PM₁₀. These measures include (but are not limited to) the use of late-model or retrofitted equipment; the use of PuriNO_x or other fuel additives; the use of ultra-low-sulfur fuel; and/or the use of PM₁₀ particulate traps.

Mitigation Measure Cul-1: Subsurface Archaeological Resources

Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged archaeological resources. The project sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall undertake an archaeological testing program as specified below. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and

treatment plan (Archeo-Tec, *Archaeological Research Design and Treatment Plan for the 935-965 Market Street Project*, July 2007) at the direction of the Environmental Review Officer (ERO). In instances of inconsistency between the requirement of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirement of this archaeological mitigation measure shall prevail. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archaeological Testing Program. The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If, based on the archaeological testing program, the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archaeological Monitoring Program (AMP). If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program shall be implemented, the archaeological monitoring program shall minimally include the following provisions:

- The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils-disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;
- The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with the project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;
- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile-driving/ construction activities and equipment until the deposit is evaluated. If, in the case of pile-driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile-driving activity may affect an archaeological resource, the pile-driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program. The archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address

the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines, Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archaeological Resources Report. The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure Haz-1: Hazardous Materials/Contaminated Soil

Step 1: Determination of Presence of Contaminated Soil

The project site is located in an area of the city known to contain fill material from the 1906 Earthquake and Fire, and such fill may contain elevated concentrations of metal and petroleum hydrocarbons. Therefore, prior to approval of a building permit for the proposed project, the project sponsor shall hire a consultant to collect soil samples (borings) from areas on the site in which soil would be disturbed and test the soil samples for contamination (including substances such as total lead and petroleum hydrocarbons). The consultant shall analyze the soil borings as discrete, not composite samples. The consultant shall prepare a report that includes the results of the soil testing and a map that shows the locations from which the consultant collected the soil samples.

The project sponsor shall submit the report on the soil testing for lead and petroleum hydrocarbons with the appropriate fee. These fees shall be charged pursuant to Section 31.47(c) of the *San Francisco Administrative Code*. DPH shall review the soil testing report to determine to whether soils on the project site are contaminated with lead or petroleum hydrocarbons at or above potentially hazardous levels.

If DPH determines that the soils on the project site are not contaminated with lead or petroleum hydrocarbons at or above a potentially hazardous level, no further mitigation measures with regard to contaminated soils on the site would be necessary.

Step 2: Preparation of Site Mitigation Plan

If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead or petroleum hydrocarbons at or above potentially hazardous levels, the DPH shall determine if preparation of a Site Mitigation Plan (SMP) is warranted. If such a plan is requested by the DPH, the SMP shall include a discussion of the type and level of contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils

on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the DPH for review and approval. A copy of the SMP shall be submitted to the Planning Department to become part of the case file.

Step 3: Handling, Hauling, and Disposal of Contaminated Soils

- a. Specific work practices: If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with petroleum hydrocarbons or lead at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including OSHA work practices) when such soils are encountered on the site.
- b. Dust suppression: Soils exposed during excavation for site preparation and construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- c. Surface water runoff control: Where soils are stockpiled, Visqueen (a type of polyethylene film) shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- d. Soils replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.
- e. Hauling and disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

Step 4: Preparation of Closure/Certification Report

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to DPH for review and approval. The closure/certification report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

G. ALTERNATIVES

Alternatives to the proposed project will be defined further in the EIR. At the minimum, the following alternatives would be analyzed that would reduce or eliminate significant environmental effects. The EIR will include discussion of the following alternatives:

1. *No Project.* The No Project Alternative is required by CEQA to be discussed in the EIR. No changes would be made on the project site. The existing three two- to five-story commercial buildings would remain on the project site. The existing theater at 945-965 Market Street would be retained and the 935-939 Market Street and 941-945 buildings would continue to operate as office buildings with ground-floor retail.
2. *Alternative With 50% Reduced Retail Space and Parking.* This alternative would include approximately half of the gross floor area of the proposed project. The alternative would be intended to reduce potential significant traffic and/or noise impacts of the proposed project. The specific extent and significance of those impacts are not known at this time, and will not be known until the EIR is prepared. Therefore, it is reasonable to assume that a reduced development alternative should result in a substantial reduction in project-related automobile trips. Specifically, the reduced development alternative would be an approximately 188,310-gsf building, with about 131,090 gsf of retail uses; about 49,410 gsf of parking, loading, and driveways and maneuvering spaces; and about 7,810 gsf of building services (common areas, mechanical, and storage spaces). The reduced development alternative building would be about 50 feet tall, excluding the mechanical penthouse. It would have three above-ground floors of retail space and one subsurface level for retail parking. The subsurface level would be the depth of the existing 10-foot-deep basement on the project site. The reduced development alternative would not include a mezzanine retail floor or a subsurface retail floor, unlike the proposed project.
3. *No Parking Alternative.* Under this alternative, the proposed building would not include a parking garage. The No Parking Alternative would be intended to reduce potential project impacts related to the use of Stevenson Street for garage access, and potential significant traffic and transit and/or noise impacts of the proposed project. The specific extent and significance of those impacts are not known at this time and will not be known until the EIR is prepared. In all respects except the elimination of the parking garage, this alternative would generally be the same as the proposed project. The proposed retail space and pedestrian access would be the same, and the alternative would retain the loading dock and bicycle parking facilities proposed for the project. To accommodate merchandise pick-up by shoppers, the alternative would include an on-site loading area with access from Stevenson Street.

H. DETERMINATION

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.



Bill Wycko,
Acting Environmental Review Officer
for

John Rahaim
Director of Planning

DATE September 29, 2008

**APPENDIX B. 2000 *HIGHWAY CAPACITY MANUAL* LEVEL OF
SERVICE TABLES AND LOCAL AND REGIONAL
TRANSIT SCREENLINES**

The 2000 *Highway Capacity Manual* was used as the basis for the transportation analysis used in the *935-965 Market Street Transportation Study*. For signalized intersections, this methodology determines the capacity of each lane group approaching the intersection. The LOS is then based on average delay (in seconds per vehicle) for the various movements within the intersection. A combined weighted average delay and LOS are presented for the intersection. For one- and two-way stop unsignalized intersections, the intersection LOS is given as the LOS for the worst intersection approach.

Table B-1 and Table B-2 present the level of service descriptions for signalized and unsignalized intersections, respectively.

Table B-1: Level of Service Criteria for Signalized Intersections

Level of Service	Description	Average Control Delay per Vehicle (Seconds)
A	Operations with very low delay occurring with favorable progression and/or short cycle length.	< 10.0
B	Operations with low delay occurring with good progression and/or short cycle lengths.	> 10.0 to 20.0
C	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	> 20.0 to 35.0
D	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	> 35.0 to 55.0
E	Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	> 55.0 to 80.0
F	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	> 80.0

Note: < means less than; > means greater than.

Source: Transportation Research Board, *Highway Capacity Manual*, 2000.

Table B-2: Level of Service Criteria for Unsignalized Intersections

Level of Service	Description	Average Control Delay per Vehicle (Seconds)
A	Little or no delays	< 10.0
B	Short traffic delays	> 10.0 to 15.0
C	Average traffic delays	> 15.0 to 25.0
D	Long traffic delays	> 25.0 to 35.0
E	Very long traffic delays	> 35.0 to 50.0
F	Extreme traffic delays with intersection capacity exceeded	> 50.0

Note: < means less than; > means greater than.

Source: Transportation Research Board, *Highway Capacity Manual*, 2000.

FIGURE F-1
MUNI TRANSIT SCREENLINES

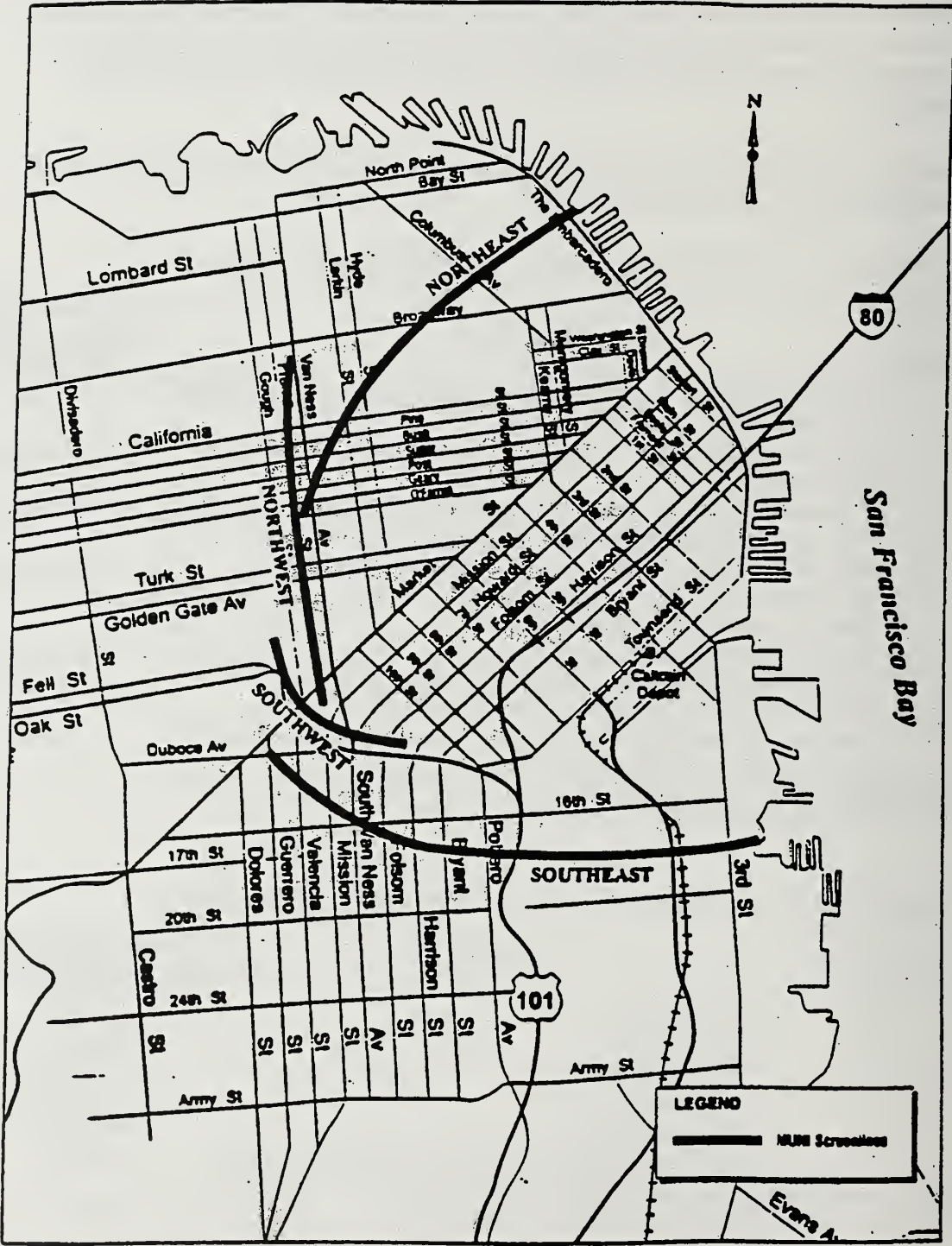
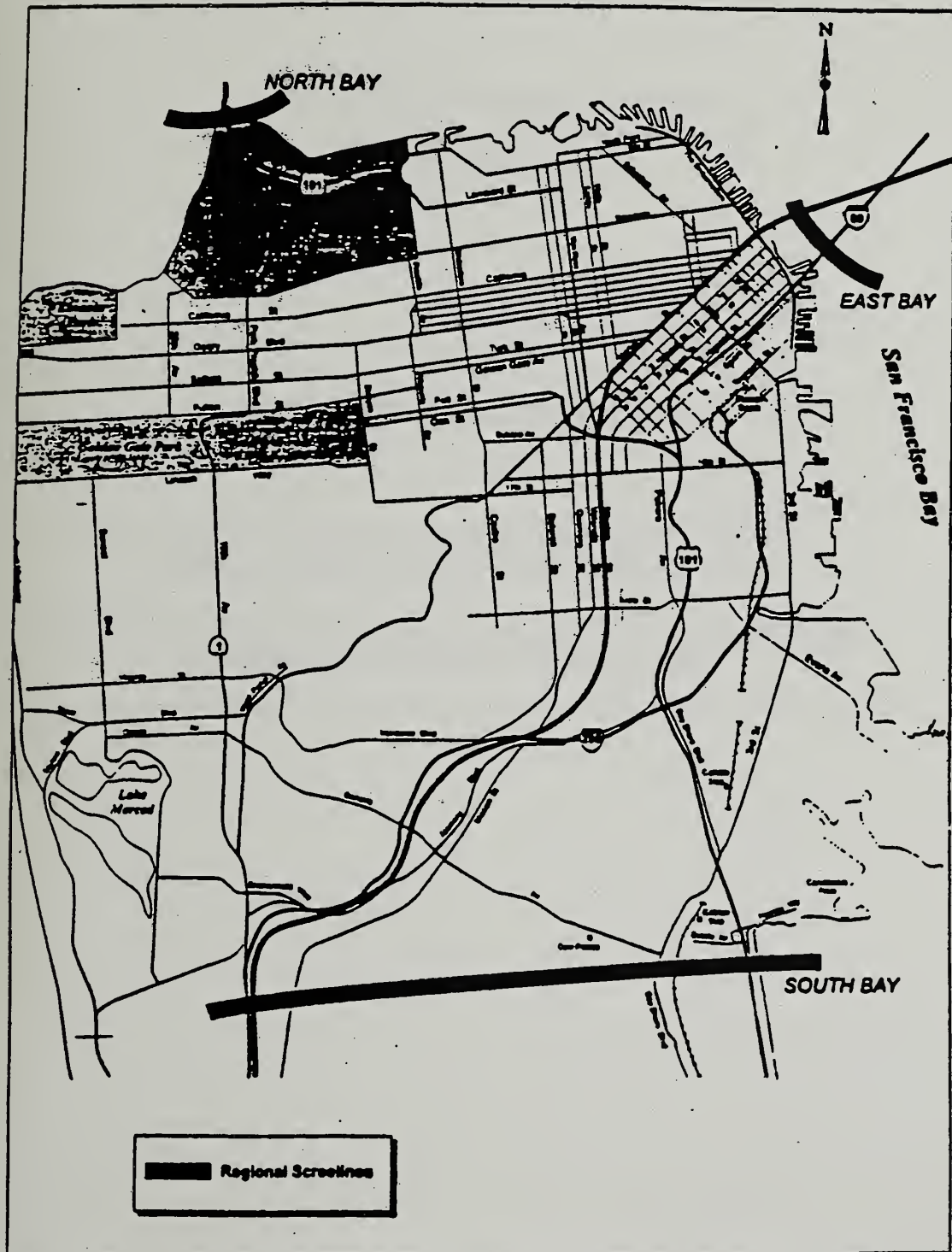


FIGURE F-2
REGIONAL TRANSIT SCREENLINES



F-9

PLACE
POSTAGE
HERE

Debra Dwyer
San Francisco Planning Department
Major Environmental Analysis Division
1650 Mission Street, Suite 400
San Francisco, CA 94103

PLEASE CUT ALONG DOTTED LINES

PLEASE RETURN THIS POSTCARD TO REQUEST A COPY OF
THE FINAL ENVIRONMENTAL IMPACT REPORT

(NOTE THAT THE DRAFT EIR PLUS THE COMMENTS AND RESPONSES
DOCUMENT CONSTITUTE THE FINAL EIR)

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

Planning Department Case No. 2005.1074E, 935-965 Market Street (CityPlace)

Check one box: ☐ Please send me a copy of the Final EIR on CD-ROM.
 ☐ Please send me a paper copy of the Final EIR.

Signed: _____

Name: _____

Street: _____

City: _____ State: _____ Zip: _____

